

1897-015 Chancery Causes: Adms. of A. J. Lockhart vs Joseph Willis & Lee Co.

Folder 1 of 2

Cox, Williams, Glass, Orr, Richmond, McPherson, Tate,
Miles, Mursey, Lambert

CA-Debt
T-Property

-Deed

Virginia,

In the Circuit Court of Lee County.

To W. T. Miller, Judge of said court:-

-----Humbly complaining, your orators, A. C. Williams and N. S. Cox, administrators of the estate of A. J. Lockhart, deceased would respectfully represent and shew unto your honor that at the Nov. term 1867, of the County Court of said county, one James W. Orr ~~obtain~~ obtained in said court a judgement against William McPherson, Stokely Lawson, James M. Parsons, Joseph Willis and said A. J. Lockhart for the sum of \$843.93, with interest on \$211.81 from March 15, 1867, and interest on \$349.60 from March 15, 1868, and interest on \$282.52 the residue from March 15th 1869, till paid and the costs \$7.31, subject to the following credits \$10.00 paid June 15, 1869, and \$77.00 October 1st 1869, which judgement was duly docketed in the Clerk's office of the said County Court and indexed as required by law. ~~As~~ (A copy of said judgemnt and docketing is here with filed as part hereof marked " A " and " B " respectively. Upon this judgement a number of executions were issued and finally the last one was returned to ^{August} ~~February~~ 26th 1875, satisfied. (A copy of said ~~execution and~~ return is here-with filed marked " C " as part hereof.) Now, your orators will further represent and shew unto your honor that the said judgement was obtained by said Orr against said William McPherson, on account of his liability as Deputy Sheriff to said Orr as Sheriff of said county, and against the said Stokely Lawson, James M. Parsons, Joseph Willis and Andrew Lockhart as his sureties in his official bond as such deputy to said Orr, Sheriff as aforesaid, and the said William McPherson and ~~James~~ James M. Parsons were totally insolvent, and the said Stokely Lawson and Joseph Willis were likewise insolvent as to personal property, ~~and~~ and the said Lockhart being a man in good circumstances was compelled to

#2

to pay and did pay to said Orr the amount of said judgement. The said Stokely Lawson after payment of said judgement by said Lockhart did settle by compromise his one-third part thereof with said Lockhart, but the ~~xxxxxx~~ said Willis never paid anything on said judgement, and being the owner of several tracts of land on Blackwater in said county at the date of said judgement afterwards, to-wit: on the 10th day of November 1869, and before said judgement was satisfied by said Lockhart executed to William W. S^ge, Trustee, a deed of trust on said lands purporting to secure to A. R. Sergener certain sums in said deed ~~mentioned~~ mentioned, and ~~indemnify~~ ~~indemnify~~ indemnifying the said Sergener ~~against~~ against pretended contingent liabilities mentioned in said deed. (A copy of said deed of trust is herewith filed as part hereof marked " Deed." The said Andrew Lockhart after satisfying said judgement, ~~xxxx~~ to-wit: on the --day of -----1887--, departed this life intestate, and your orators on the ~~2nd~~ day of September 1889, were appointed and qualified in said County Court as his administrators. (A copy of said appointment and qualification is filed as part hereof marked " E." -----Now, your orators will further represent and shew unto your honor that the said deed of trust was executed by the said Joseph Willis for the purpose of hindering, delaying and defrauding his creditors, and especially to avoid the payment of any part of said judgement, but your orators were not apprised of said fraud as practiced by said Willis in the execution of said deed, nor of the fact that the said deed had been set aside and held for naught, in an injunction suit instituted in your honor's court by said Willis in March 1886, enjoining the collection of said deed of trust by James W. Orr, administrator of A. R. Sergener, deceased, until within the last few days. Your orators allege that said deed of trust was executed by the said Willis for the fraudulent purpose of avoiding the payment of any

part of said judgemnt, and was virtually declared null and void by decree in said injunction cause Nov. 27th 1886, perpetuating the injunction, which cause is yet on file in your honor's court and is prayed to be considered herewith as part hereof.

-----Now, the object of this suit is to obtain a decree decraring said deed of trust null and void so far as your orators' ~~claim~~ claim is concerned, and subrogating your orators to the lien of said judgemnt against said Willis for one-third of the amount thereof, and subjecting the real estate of said Willis to the payment of his one-third of the amount of said judgement paid by said Lockhart as afore-said; the said William McPherson and James M. Parsons being at the time of the rendition of said judgemnt and ever since until the time of their death totally insolvent.

-----To this end they make the said Joseph Willis and J. W. Glass, who has purchased from said Willis and claims to own a ~~per~~ portion of said land, the parties defendant to this bill and asky that they be required to answer the same, but not on oath that being waived; that on a hearing the said deed of trust be held for naught so far as ~~u~~ your orators claim is concerned, and ~~thereafter~~ the real estate of the said Willis sold to pay said one-third of said judgement and the costs of this suit as the same will not rent for a sum sufficient in five years to pay the same. There are no other liens on said real estate. May process issue, directed, etc. And your orators will ever pray, etc.

Wm. A. Orr, Sr.
Wm. A. Orr, Sr.

N. S. Coe & A. B. Williams, Admin's &c.

vs. } Bill.

Joseph Willis, et al.

Ordn & Plantership & M. A. Orr
pg.

1896 2nd May rules bill
sums & d. & d.
" 1st June rules taken
the last Monday in
May & Confd & Co. in
Set for hearing
for Gen. Court

Mar 7 1897 Court
June 11 " Decree final
See Order Book
Page 838

Plaintiffs Costs

Clerk 1.40
Shff 4.50
Cock 4.55
wito 1.00

~~17.93~~

Defts Costs

Clerk 4.29
Com in Chy 6.00
aty 15.00
P. C. 2.25
Estimate 1.25
Total 28.39

~~28.39~~

Plffs Costs

Clerk 8.21
Shff 1.40
aty 18.00
P. C. 4.50
wito 1.00
Com in Chy 6.00
Co Clerk 4.55

~~40.32~~

Virginia: In the circuit court of Lu County
To the Hon. L. J. Miller, Judge of said Court:

Your Petitioner W^m A. Orr, humbly complaining respectfully represents to the court, That there is a Bill in Chancery now pending in this Court wherein N. S. Leoy and A. L. Williams, Administrators of the estate of A. J. Lockhart, deceased, are plaintiffs and Joseph Willis et al are defendants; that the object of said suit is to enforce a Judgment Lien against Real estate; and, that said bill charges that there are no other liens against the Real estate of said Joseph Willis. Your petitioner charges that there are other liens against the lands of Joseph Willis named in said suit; that your Petitioner has a Judgment Lien against the same which Judgment was rendered by H. C. Joslyn, J. P. for Lu County, Va, on the 25th day of July, 1896, for the sum of \$5⁰⁰, with legal interest thereon from the 30th day of March, 1881, and \$1⁴⁰, Costs - waiving the Homestead. A copy of which Judgment is here filed marked "D" and prayed to be taken as part of this petition; that your petitioner gave the said Joseph Willis a written notice on the 29th day of July, 1896, that he would seek to enforce the collection of said Judgment against his land unless the same was paid within sixty days which time has long since expired; that no part of your petitioner's said Judgment has been paid, but the same is still owing to your petitioner. Said notice is here filed marked "60 days notice". There is one other Judgment against said Willis and a lien on said land. It is in favor of Winder Bledsoe, and for the sum of \$19.25, with legal

N. S. Leary et al., Admin's

vs } Petition of Wm A. Orr

Joseph Willis et al.

Filed in open Court
I by leave thereof Nov
the 5th 1896
A B Munsey Clerk

interest thereon from 11th day of October, 1892, till paid
and \$6.20 costs, leaving the Homestead, and re-
manded by the County Court of Lee County, Va. on the
20th day of August, 1896, an Attested Office Copy of
which is here filed marked "Blindfold".

Your petitioner prays therefore that the liens against
the said land of Joseph Willis be ascertained and
that the same be sold to satisfy all the liens ac-
cording to their priority. And as in duty bound he
will ever pray &c., &c. Wm A. Orr, Petitioner.

Virginia, In the Clerk's Office of the Circuit Court of Lee County.
I, hereby certify that Wm A. Orr appeared before me this
day in my Office and made oath that the foregoing
petition is true. This October 10th, 1896.

A B Munsey Clerk

"Bledsoe"

Virginia: At a County Court Continued and held
for Lee County at the Court house there on Thursday
August 20th, 1896.

Present the same Honorable Judge as on yesterday,
Winder Bledsoe Plff

vs

For a warrant

Joseph Willis Deft

A 1.25
C 3.45
J 1.00
J 50
\$6.20

This day came again the parties by their
Attorneys, and by agreement of the parties, it
is considered by the Court that the plaintiff recover
against the defendant the sum of \$19.25 with
interest from the 11th day of October, 1892, until
paid, and his costs here and before the Justice.
And so execution shall issue on this Judgment
for the period of 60 days.

A copy

Wm. A. T. F. Richmond Clerk

Virginia---Lee County, To-Wit:

To J. B. Shufflebarger, Constable of said County.
I hereby command you to summon, Joseph Willis

It to be found in your District to appear at Jonesville in
said county, on the 20th day of June 1896 before me or such
other Justice of said County, as may be there to try this warrant, to answer
complaint of William A. Orr

and upon a claim for money not exceeding \$100, exclusive of interest, to-wit:
For the sum of \$ 5.00 due by Note, and then and
there make return of this warrant.

Given under my hand the 6th day of June 1896.

W. C. Joslyn J. P.
William A. Orr } On the 25th day of July 1896.
Joseph Willis } (In debt) At Jonesville in said County.
JUDGMENT, That the Plaintiff recover of the Defendant \$ 5.00 with interest thereon from the
30th day of March 1881, till paid, and \$ 1.40 for costs

VIRGINIA—Lee County, To-wit: To J. B. Shufflebarger Constable of said County.

I command you in the name of the Commonwealth of Virginia that of the goods and chattles of
Joseph Willis, in your county, you cause to be made the sum of \$ 5.00
with interest thereon from the 30 day of March 1881 till paid, which William
A. Orr has recovered before me in a
warrant in debt, and also the sum of \$ 1.40 which were adjudged to the said William
A. Orr for costs in prosecuting said warrant.

Given under my hand the 25 day of July 1896.

W. C. Joslyn J. P.
The note upon which the above Judgment
was rendered waived the Homestead exemption
This July 25 1896. W. C. Joslyn J. P.

Recd of W. A. Orr 50 cents my
Costs in the within Case.
This July 27th 1896. H. L. Jordan J. P.

Received of Wm. A. Orr 90[¢], my costs in this case
This July 27th 1896.

J. B. Shuffelbarger. Const.

Wm. A. Orr

summons for Plaintiff
as witness J. W. Orr

Wm. A. Orr
vs } Warrant
Joseph Willis
Executed this by
summoning Joseph
Willis and summoning
2 witnesses, this the
15th day of June 1896
J. B. Shuffelbarger, C. C.

Certs.	J. P.	50
Constable		90
		<hr/> 140

I certify that I this day
docketed and indexed
this Judgment in the
Judgment book docket
of Lin County, Va. - & that
my fee therefor is 25[¢].
(Code 3, p 128) This July
27th 1896.

J. W. Richmond Clerk

This Case is continued until July 20th
1st day of Cornish Court. On request of the
Defendant this June 20th 1896.
This Case is continued until Sat-
-urday July 25th 1896.
This July 20th 1896. H. L. Jordan J. P.

"60 days notice"

To Joseph Willis:

Whereas, H. C. Joslyn, a Justice of the Peace of Lee County, Virginia, died on the 25th day of July, 1896, under a judgment in my favor against you for the sum of \$5.00 with legal interest thereon from the 30th day of March, 1881, until paid and \$1.40 for costs. Now, therefore, you will please take notice that unless you pay to me the amount of the judgment within sixty days from the date of the service of this notice, I will file a bill in Chancery against you in the Circuit Court of Lee County, Virginia, and will pray said Court to subject your real estate in this County to the payment of said judgment, the costs of this notice, and the costs of said suit in Chancery.

This July 25th, 1896.

Wm A. Orr

Wm A. Orr

vs } 60 days notice

Joseph Willis

Executed by delivering
a true copy of the within
notice. To Joseph Willis

This July 29th 1896

Evon Bledsoe

D8

for W P Weston

88C

1 Shffle for 509 1

To the Hon. W. T. Miller Judge
of the Circuit Court of Lee Co.

The undersigned answer of
Joseph Willis to a bill filed in
this Hon. Court against him & others
by H. S. Cox & A. C. Williams administrators
et al.

The Respondent says the
plffs Bill is not good and suf-
ficient in law & of this he prays
judgment of the Court &c.

But should any other or
further answer be deemed nec-
essary, answering the same, that
he is informed and believes it to
be true that the plffs intestate
had placed in his hands Collat-
erals as securities for said judg-
ment, quite a sufficient amount
by said Wm McPherson, or and
against one A. R. Surgenor to
fully pay, and that the same did
fully pay all of said supposed
judgment, in which respondent is
alleged to be jointly bound, to the
said intestate, and that said in-
testate collected from said Surgenor
and others on said Collaterals a

sum quite sufficient to re-pay and
disburse him in all or every part
so paid out by him on said
Judgement. And so respondent
denies that the plffs intestate or the
plffs have or ever had any cause
of action against him, by reason
of said Judgement. But if mis-
taken in this he is informed and
believes that the plffs intestate had
a sufficiency of said Collaterals
to pay said Judgement and that
he compromised & released said
Creditors in said Collaterals from
a sufficient amount to pay the
same, that he did this without the
said Mr Phersons Consent or the con-
sent or knowledge of this respondent.
Respondent denies that he ever
conveyed his land to A.R. Sur-
ger or any one else in fraud
or to hinder delay or defraud the
plffs intestate the plffs or any
one else, he has had ample
lands & property at any and
all times to pay not only
this claim but any just demand

against him, and the peff allegation
of fraud and its recent discovery
is no doubt the invention of some
lawyer to endeavor to hedge
around a ~~demanded~~ state of case
plainly against the peff. This re-
spondent is advised that the
demand of the peff is barred by
the statute of limitations the pro-
tection of which he here claims
and demands. And that if not
so barred the demand is stale and not
enforceable in a court of equity the
peff being guilty of gross negligence
in waiting until all the parties who
could explain this matter are dead
and all trace of the matter lost.

This respondent denies each & every
allegation of the peff but not here-
in admitted, and calls upon them
for full proof thereof. And having
now fully answered he prays to
be hence dismissed with his
costs.

Prudence H. H. H.

Joseph Willis-

Adm. J. Answer

A.S. Cox & A.C. Williams
Adm.

Filed in open Court
and by leave thereof
June the 3rd 1896
A.B. Muncy Clerk

J. C. Niles

U.S. v. T. Williams & Co. v. Supreme
Court
Joseph Williams -

This Court
came on this day to be
heard upon the Bill of the
Jury, and exhibit, files, the
evidence of the defendant's
replication thereto; and the
depositions of witnesses and
exhibit therewith and was
argued by Counsel.

The Court
after a recess of one hour for reasons
appearing to the Court, the
Judgment sought to be
enforced by the Juries Bill, is
in the opinion of the Court
based by the Statute of Limit-
ations - It is therefore adjudged
order and decree that the
Juries Bill be the same is
thereby dismissed; and that the
defendant recover from the
plaintiff their costs in this
Suit - And by Consent of the
parties the Court is now

have to wait upon his claim
 and the proof by common law.
 with that the ~~proof~~ said case
 is settled to decide the case
 by its balance of his claim
 than the cost, he has received
 in his prosecution has - and
 the cause is struck from the
 docket.

David Williams
 attorney

2 } Deane
 Deane

Joseph W. W.

June 8, 1897

See 2003 C. p. 807.

14 / 1897

A. C. Williams and N. S. Cox, Admin's of A. J. Lockhart, dec'd
vs J. L. L. L.
Joseph Willis et al

This case came on to be heard upon Exceptions to the deposition of J. V. F. Richmond, Clerk, filed on the 27th day of February, 1897, and was argued by Counsel; Upon consideration of which, and the Counsel, A. L. Richmond, for the J. V. F. Willis having withdrawn his exception to said deposition for want of notice, the Cause is continued.

Leop & Williams Admis
vs J. L. L. L.

Joseph Willis et al
Eu. C. B. B. p. 535.

(2)

Entire

177, 178, 179
Rich 57, 1897.

N. S. Cox & A. C. Williams

Admrs of A. J. Lockhart, dec'd

vs

J. Deere

Joseph Willis & J. W. Glass

This cause came on this day to be heard upon the bill, exhibits filed therewith, process executed, and the demurrer and answer of Joseph Willis, the joinder in said demurrer, and the general replication to the answer of said Joseph Willis, and was argued by Counsel: On consideration of which and for reasons appearing to the Court the Cause is continued.

N. S. Cox et al Admin^{rs} &c

vs Decree No. 1

Joseph Willis et al

Q. B. P. 4714

Enter

June 4th 1896

N. S. Cox and A. C. Williams, Adm'r's of Andrew Lockhart, Dece'd.

Against (In Chancery. (Depositions of Defendant.)

Joseph Willis, Defendant.

-----The deposition of Joseph Willis and S. V. F. Richmond, taken by agreement before H. C. Joslyn, J. P., at the office of Orr & Blankenship, Jonesville, Lee County, Virginia, on the 15th day of October 1896. Present: W. A. Orr and G. W. Blankenship, of counsel for plaintiffs, and Joseph Willis, Defendant, and A. L. Pridemore, counsel for Defendant.

-----Joseph Willis, a witness of lawful age being duly sworn deposes and says:

The taking of this deposition is objected to--because the witness is a party to this suit, and because a party to the original contract, Andrew Lockart being dead.--W. A. Orr, Sr., and G. W. B., of counsel for plaintiffs.

Ques. 1. State if you are the defendant in this cause, and if you answer yes, state whether or not the Sheriff of this county ever presented an execution to you and demanded property thereon. I mean an execution issued on the judge ^{ment} ~~case~~ in this suit.

Objected to because irrelevant and immaterial--Orr & Blankenship, of counsel for plaintiffs:

Answer. The Sheriff never presented an execution to me.

Ques. State whether or not if he had presented it you had personal property for the last twenty years out of which amount of \$250.00 or ~~\$300~~ ^{the} \$300.00 could have been made ?

Objected to because irrelevant and immaterial-- Orr & Blankenship, of counsel for plaintiffs.

Answer. Yes, Sir, I have had property all the time. For several years I was the owner of and run a large distillery. I raised on my farm four and five hundred bushels of corn, and I have ~~xx~~ each year of my ~~xx~~ life during the past twenty years more hogs, sheep, cattle and horses that I was entitled to hold by law.

Ques. State whether or not the plaintiffs in this suit, N. S. Cox and

~~XXXXXXXXXXXXX~~

Objected to because irrelevant and immaterial--Orr & Blankenship,
of counsel for defendant.

Ques. Please state whether or not within the last twenty or twenty-five years you have owned and had good title to any lands in this ~~county~~ county, other than those conveyed by deed of trust to W. W. Sage, trustee, securing A. R. Sergener, in certain sums of money shown by said deed? If you answer yes, state where said lands were situated and about their value?

acknowledges
received the 6

(3)

since I have been relieved of the payment thereof I continued all the time in the possession of the said land and paid taxes on the same.

X-Examination.

Ques. 1. Was the deed from Walter P. Hamilton, ~~and~~ Alexander Hamilton ~~xxxxxx~~ and Mary Hamilton dated February 13, 1871, recorded in the Clerk's office of the County Court of Lee County, Virginia, prior to Sept. 21, 1874, the day when the deed from you to James M. Stamper was recorded for the same land?

Objected to because the records are the highest and best evidence and shows for itself---Pridemore & Seweell, for Deft.

Answer. I can't tell that as I can not neither read or write. I only know what I have been told. I have referred to these deeds in the former part of this deposition, and have given the dates there as I am ~~told~~ told they stand upon the record.

Ques. 2. Did you have any of the deeds recorded in said Clerk's office to you for any of the tracts of land which you say you bought and sold prior to the time when you did sell, and if so, which one?

Objected to because the records are the highest and best evidence, and because the witness has stated he can neither read or write and so can not possibly answer the question--Pridemore & Sewell, for Deft.

Answer. I brought them here to be recorded but can not answer whether they were or not as I can neither read or write.

Ques. 3. From whom did you purchase said tracts of land so bought and sold by you, and how many acres are there in each tract, and please ~~give~~ give the location of each tract?

Answer. I bought fifty acres from a fellow by the name of Isaac Bledsoe and then I bought as well as I recollect from Elias Bledsoe one hundred or one hundred and five acres, I think I then bought as well as I recollect another tract from Wynright Lawson containing 78 or 79 acres, then I turns in and buys out a whole lot of heirs of Sampson Bledsoe's estate and dower of his widow. I think I bought out all the heirs of Sampson Bledsoe out, then I bought 35 acres of G. B. Wallen, this has not been very long back, 5 or 6 years or so, I purchased this land a few years before I got a deed. This si all that I remember of ~~n~~ now.

(4.)

Ques. 4. How much of this land did you so sell and to whom ?

Answer. I sold some of it to Wesley Glass, do not remember the amount and it was not measured; I do not remember of selling any to any one else.

Ques. 5. Did you make Mr. Glass a deed to this land ?

Answer. I have to a part of it and a part of it I have not.

Ques. 6. Does Mr. Glass hold a title bond ~~to~~ from you requiring ~~him~~ you to convey this land to him ?

Answer. I sold him some for which he does not hold a title bond for or any other paper.

Ques. 7. From whom did you get the land embraced in the deed of trust executed to W. W. Sage, trustee, for the benefit of A. R. Sergener ?

Answer. I do not know who I got it of; it is a part of several parcels. I think a part of it is a part of the 79 acres spoken of.

Ques. 8. Did you get any of it from any other person or persons than the ones heretofore named by you ?

Answer. I recon not, Sir.

Re-Examined in Chief.

Ques. 1. What is a fair cash value of the lands conveyed to Sage as trustee sold on a credit of say one and two years ?

~~Answer.~~ Objected to because evidence in chief---Orr & Blankenship, of counsel for plaintiffs.

Answer. I hardly know what it would be worth, but merely giving my estimate would say \$1000.00.

Ques. 2. What is the fair cash valuation on the same terms of the land the you now own and which you have not sold to Wesley Glass or any ~~other~~ other person?

~~Answer.~~ Objected to because evidence in chief---Orr & Blankenship, of counsel for plaintiffs.

Answer. I would say ^{two} ~~one~~ thousand dollars.

And further this deponent saith not.

Joseph H. Hillis
Mark

The further taking of depositions in this case is continued until Saturday, October 17, 1896, at the same place between the hours of 8 A. M.

and 4 P.M.

This Oct 15th 1896. H. C. Jorlyn, J. P.

Virginia Lee County Court,
I Henry C. Jorlyn, a Justice of the
Peace for the said County, do hereby
certify that the foregoing deposition
of Joseph Willis, was duly taken,
sworn to and subscribed, before me
at the time and place mentioned in
in the caption of the same.

Witness under my hand this, the
15th day of October 1896.

H. C. Jorlyn J.P.

Thomas McPherson, a witness of lawful age being duly sworn deposes as follows:-

Ques. 1. State whether or not you are acquainted with Joseph Willis, and how long have you known him?

Ans. I am and have known him since about 1862. Have been well acquainted with him ever since the war.

Ques. 2. State whether or not you are acquainted with the personal property holdings of the said Willis during this time, and if you answer yes, state whether or not that he did not have more or less personal property all these years?

Ans. I am tolerably well acquainted with his personal property and have been ever since the war. He has had more or less all the while. About 15 year ago I bought some grain ~~xxxxxxx~~ of him, and he had a good many hogs. I am more particularly acquainted with his grain and hogs.

Ques. 3. Is it not a fact that there was no time that a small debt could have been out of Mr. Willis, and much of the time considerable debts could have been made out of him?

~~Ans.~~ Objected to because leading--Orr, for Plaintiffs.

Ans. In the fall season I consider there was no year except what a small debt could have been made out of him, and some years larger ones. In the fall season he has always had from 300 to 600 bushels of corn. He always had a good lot of hogs, and a lot of horses, more or less.

Ques. 4. State whether or not Mr. Willis ever run a distillery during these years, and if so, how long ago, and if you answer yes, state whether or not he did not have considerable personal property?

Ans. He did run a distillery some 18 or 20 years ago, and had a ~~xxxxxx~~ good many hogs during that time, and other personal property; he always ~~xxx~~ kept more or less horses, I do not know the number. I paid more attention to his grain as I bought it from him every year, most every year.

Cross-Examined:

Ques. 1. Where was his distillery situated?

Ans. There on his farm, South of his house, upon a sort of a cliff.

Ques. 2. Was it a licensed distillery, or an illicit one?

~~Ans.~~

Objected to because immaterial--Sevell, for Deft.

Ans. It was not licensed, but an illicit one.

Ques. 2. During what years did Mr. Willis have the hogs and horses about which you speak?

Ans. The hogs I have most reference to was from the time of his distilling up to about ten years ago; the horses was all along, but I do not rememehr the number, he has but one now. I ahve seen him have as ~~hi~~ high as two or three and some times 4, ~~xxxxx~~ and I grumbled at him for keeping so many horses and feeding his grain out to ~~him~~ them.

~~Ques.~~ Objected to-- what the witness should have said to Willis about keeping the horses as not responsive to question and inadmissible.
Orr, for Plaintiffs.

Ques. 3. Do you know whether or not the property you have spoken of be-

longed to the Defendant, or some of his family, or to some one else, and was only in his care ?

Ans. I know the fact that it was his property, and I have suggested to him sometimes when he was pressed with debts to take advantage of the law and he always said no, he would not do that, that what he had was liable for his debts, and that he would not take ~~no~~ advantage of any exemption law, and I never knew of his shifting any property ~~except~~ ~~xxxxxx~~ but he did tell me that he gave a deed of trust to Abe Sergener on his land, where he lives.

Ques. 4. How far did you live from the defendant during all these years since the war ?

Ans. I have lived in as close as five miles except two years when I lived in Scott County, and I was then in about fourteen miles of him, I have lived ~~xxx~~ as near as ~~xxx~~ two miles of him, and did for ten or fifteen year.

Ques. 5. How much corn do you say Mr. Willis now has, and where is it located ?

~~Ans.~~ Objected to because immaterial--Seweell, for Deft.

Ans. I never examined his corn close, but he has some 100 to 150 bushels of corn in his crib, and he told me he had 50 bushels in his loft.

Ques. 6. How do you know that this property belongs to Mr. Willis ?

Ans. I do not know it to be a fact, but I never heard any one else claiming it.

Ques. 7. Did you hear him claim it, if so, when and where ?

Ans. I heard him claim ^{it} and within the last four or five days at my house.

Ques. 8. When did you see said corn.

Ans. Last night and this morning. I stayed at his house last night.

Re-Examined.

Ques. 1. State whether or not he did not run his distillery publically and was it not at a time when distilleries were very frequent in this country ?

Ans. He did run it publically, and they were frequent in this country at that time.

Re-Cross-Examined.

Ques. 2. Did the people of that neighborhood, and espacially did Mr. Willis, run illicit distilleries in open violation of law ?

Ans. He did not that I know of. We knew nothing of the Internal Revenue laws in that neighborhood at that time.

Ques. 2. Do you mean to say that the people of that country and espacially Mr. Willis, did not know that it was a violation of state and National Law during all the time of which you speak, to make and sell ardent spirits illicitly?

Ans. There was nothing said about the Revenue laws at that time. Soon as the officers began to come around he quit, or as soon as it was known to be a violation of the law. And he has not run one since that I know of. ~~And~~ And further this deponent saith not.

Witness claims
1 day 50 cts.

Jnos. McPherson

Virginia Lee County Court:

J. Henry C. Joslyn, a Justice of the Peace
for the said County, do hereby Certify, that
the foregoing deposition of Thomas
McPherson, was duly taken. Sworn to
and subscribed before me at the office
of our & Clerkship, in Jonesville Va
on this 23^d day of February 1897.
Given under my hand this 23^d day
of February 1897. H. C. Joslyn J. P.

N. S. Cox & A. C. Williams
Adverses of S. Lockhart
vs. S. C. Chiey.
Joseph Willis

The depositions of
Joseph Willis &
Thomas McPherson

Received from H. C. Joslyn
the J. P. before whom taken
and filed February 24th
1897. A. B. Munsey Clerk

By the Court

A. B. Munsey
Witness
\$1.50
.50

1 The depositions of John W. McPherson
2 & others taken before me J. B. Munsey
3 at the law office of Pridemore & Sewell Jonesville Va
4 a Commissioner in Chancery for the Circuit Court Lee County
5 furnished to notice but, ^{on the 28th day of May 1897} attached to
6 be read as evidence in the Chancery
7 Cause of Cox & Williams against
8 Joseph Willis et al on behalf of the
9 defendant pending in the Circuit
10 Court of Lee County Virginia;

11 Present. J. C. Sewell for Deft
12 O. B. Blankenship for Plff.
13 John McPherson a witness of lawful
14 age after being duly sworn deposes and
15 Says.

16 Q. Are you a son of the late William
17 McPherson.

18 The taking of these depositions is excepted to
19 unless in rebuttal of the plaintiffs relating
20 testimony. The plaintiffs and defendants having
21 taken and closed in chief.

22 O. B. Blankenship for Plffs.
23 Q. Is the above objection in ref
24 well taken? The defendant
25 has never closed never had
26 an opportunity to the plff
27 took depositions the Saturday
28 before last Court?

29 O. B. Blankenship for Plffs.
30 Ans. I am.
31 Q. Please state whether or not you
32 have any knowledge of William McPherson

1 in his lifetime turning over any notes
2 orders, accounts, Tax Tickets or the like
3 to the late Andrew Lockhart in his life
4 time, to be applied by the said Lock-
5 hart in discharge of a liability that
6 he Joseph Willis, Stokely Lawson and
7 James M Parsons were under by rea-
8 son of their Suretyship of the said
9 McPherson as Deputy Sheriff of James
10 McPherson late Sheriff of Lee County?
11 if you answer yes please state all
12 you know about it.

Ans. yes Sir I know of an order
that he gave him on A.R. Surgenes
My recollection is that the order amounted
to \$300.00. As to the Tax tickets I know
nothing about. Only what my father
told me. he told me that he turned
over some tax tickets. I do not remem-
ber what he said about the amount.
This answer is further excepted to as to the
hear say.

39m

Ans. A. R. Surgenes.

State whether or not you know if
said order was accepted and paid and
whether or not you ever heard Andrew
Lockhart say anything about it.

Ans. That was my understanding that
it was accepted and settled. Under-
stood from Mr Lockhart that the order
was accepted when presented. There was
a suit between Lockhart & Surgenes at

about the order. Surgener accepted the order in my fathers lifetime and the suit was brought after his death on the order.

This answer is further excepted to, ^{as inadmissible} because it develops that suit was brought on the order, and the record of the suit is the best evidence.

Dr. & Blankenhip for Opps.

Ques. State whether or not you were familiar with your fathers business, and often talked to him in regard to it about the time this transaction occurred, and if you cannot state the exact amount of tax tickets or orders that you understood to be turned over by your father, state your best impression of the amount.

Ans. I was, and often talked to him about it. why I did so we were fixing to move to Ky. my father and I, and I told my father he had better fix up this matter or Lockhart would attach on ~~the~~ what he had, and he said he was going to fix the matter up so that was all that was bothering him. he turned over as I understood ~~to some~~ some tax tickets and perhaps some other effects sufficient to satisfy Lockhart, as my father informed me. I was not present but know that they met to settle. he moved to Ky and no attachment proceedings were taken against him.

1 This answer is further excepted to as inad-
2 missable as to what Mr. McPherson said
3 and the evidence of this witness is excepted
4 to as incompetent, Andrew Lockhart being
5 dead. Orr & Blankenship for Defts.
6

7 Examined

8 Ques 1 Was the Judgment in favor of James W Orr
9 late Sheriff before or after your father
10 moved to Ky.

11 Ans I Cannot state, remember whether it was
12 before or afterwards, but my impress-
13 ion is that it was afterwards, it seems
14 to me that Lockhart was trying to get
15 the means in hands so as to settle the
16 matter without the Costs of a Suit, we
17 remained in Ky a little over a year
18 and returned, and my father died in
19 a short time after we returned.

20 Ques 2 Do you know who paid the two Credits men-
21 tioned in said Judgment. one of \$1000 June
22 15th 1869, and the other \$7700 Oct 1st 1869.

23 Ans I do not.

24 Ques 3 Were you present when you say the tax tickets
25 were turned over?

26 Ans No I was not present, My father stayed with
27 Mr Lockhart and we drove on, and when he
28 came up he told me about it, That is the
29 tax tickets, the order had been accepted some
30 time before as Mr Lockhart told me.
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Ques 4. Do you remember whether Mr Surgenor accepted
the order you refer to Conditionally or unconditionally.

Ans. Mr Lockhart just said he wrote on the order
accepted.

Ques 5. Who administered on your father's estate.

Ans. I think Jos McPherson, my brother, am not positive.

Ques 6. Were there any receipts found among his papers
for the tax tickets &c, you say he said he turned
over to Lockhart.

Ans. None that I know of.

Ques 7. Do you not know the fact that your father
turned over to James W Orr, Shff, his uncollected
tax tickets about the time he and his sureties
were motioned by Orr & got credit for them?

Ans. I don't know anything about that.

Ques 8. How old were you when your father moved
to Ky.

Ans. I am going on 51 years old and it ~~was~~ has
been about 28 years, so I was about 23.

- Re-Exam -

1 Quest Please state if you know
whether or not your father shortly
before he met with Lockhart to
settle had any ~~tax~~ tax tickets
& whether or not you ever saw
him ^(your father) with any after that time?
He did have ~~some~~ tax tickets ^{that} he
was going to leave in Lockhart's
hands & I never saw him have
any after they met. He told
me that he was going to turn
them over to Lockhart I don't know

1 just how long it was before the time
2 that ~~the~~ ~~him~~ ~~that~~ ~~he~~ ~~had~~ ~~them~~.

3 State whether or not your father
4 was Deputy Sheriff at that time
5 & as such collecting taxes.

Ans. Yes.

6 And further this deponent saith Not.

7 John W. McPherson

8 Joseph Willis another witness of lawful age and
9 being duly sworn deposes and says.

10 The evidence of this witness, for any purpose,
11 is again excepted to because he is incompetent,
12 Andrew Lockhart, the other party to the original
13 transaction being dead, and is further excepted
14 to unless in rebuttal of plaintiffs relativity evidence.

15 Onr Blankenship - for Aff.

16 This objection is not well
17 taken Hon. J. W. Orr deposition
18 has been taken by the plaintiff
19 which renders Willis competent
20 as he is also a party to the
21 transaction, the subject of the
22 investigation - This renders
23 Willis competent.

24 Preliminary Dues

25 We hand you the several Executions
26 filed with J. V. R. Richards deposition,
27 ^{marked 1 to 10} please look at them & say if you
28 know which are paid & which ones.
29 Besides the credits I have paid \$10⁰⁰ on
30 Nov 1 or 6. I ~~don't~~ ^{can't} remember about

That is No 2 & 3.

that. If I owe any ~~thing~~ on it I don't know it. No 5 I have paid in full & have a receipt for it. No 4 I don't remember about. No 10 I have paid to Brucier. No 7 is subject to a credit of \$70 for a mare.

Quest 2 Can you state why these several executions were returned No property, was it because you had no property?

I do not know why they were so returned & they were returned ~~without~~ without my knowing it. ~~I always thought~~ I generally had property above exemptions.

With the petition of M. A. Orr there is filed two judgements, one M. A. Orr against you & the other of Winder Bledsoe, if there are paid or any part thereof state what? I have paid \$13⁰⁰ on the M. A. Orr judgement & he was to wait on me till June court for the balance about \$3⁰⁰ as it was calculated. On the Bledsoe judgement I have paid \$17⁰⁰ on it myself & as I understood it Mr. Blountship was to take over Bledsoe for the balance.

State whether or not you knew of Andrew Lockhart in his

1 life time Collecting any tax
2 tickets?

3 I do know of his collecting
4 them. I paid him my taxes.

5 Do you ~~now~~ know ^{when} or remember
6 about the time Mr. William McPherson
7 son died moved to Kentucky?

8 I cannot remember the date,
9 but I remember his going.

10 Was it about that time
11 you paid taxes to Andrew
12 Lockhart?

13 I think it was after he
14 moved to Ky.

15 How long afterward?

16 I don't remember the time, but
17 it was not very long afterward.

18 I know of his collecting from others. and I know of
19 McPherson letting him have debts on persons and
20 his collecting them. One man James Lambert
21 and he told me Lambert paid it in corn, mostly,
22 and one an Ira G. Sprinkle and Lockhart told me
23 he thought he had it in shape and that Hurst was
24 going to pay it.

25 The answers of the witness are further ex-
26 cepted to as to his statements about his paying
27 the debts in his answer mentioned, because
28 irrelevant and immaterial

29 On Blackenship for Off.

30 + Exord.

31 When did you pay the \$40.00 on the Richmond

1 debt.

Ans. 2 I expect 2 or 3 years ago.

Ques. 3 When did you pay the Carr Bailey debt.

Ans. 4 About 2 years ago.

Ques. 5 When did you pay the amount to Mr A Orr.

Ans. 6 The first a month or so ago & the last a week or few days ago.

Ques. 7 When the ^{debt} ~~Winder~~ Bledsae debt.

Ans. 8 Some two Mos ago.

Ques. 9 What years taxes did you pay to Lockhart.

Ans. 10 Don't remember the year, but it was awhile after Mr McPherson moved to Ky. ^{and you Lockhart}

Ques. 11 Do you know whether or not Mr McPherson had dealings with each other, about other matters than the matter about which you have spoken?

Ans. 12 If they did I did not know it.

17
18 Re examined.

19 I now hand you what purports to be a copy
20 of a note executed by you to S. L. Pridemore
21 April 24th 1887, for \$431.24 will you please
22 file the same with your deposition marked
23 "Willis".

24 This question is further excepted to as irrele-
25 vant and immaterial.

On & Blaukenship for Off.

Ans. 26 I here file the said copy of the Pridemore
27 note, marked "Willis".

Ques. 28 Were Executions out against you for collection
29 of the Mr A Orr Winder Bledsae debts when you
30 made the payments you state on them.

Ans. 31 I think there was, as I made some of the payments
to the officers.

1 And further this deponent saith not.
2 And further this deponent saith not.

Joseph ^{mark} Willis

3 The further taking of these depositions is
4 adjourned until Monday the 31st day of
5 May 1897 at the place. Given under
6 my hand this the 28th day of May 1897

A. B. Munsey Commr in
Chancery

7 Met pursuant to adjournment
8 at same place. This May 31st 1897.

9 Present D. C. Sewell for Defth
10 Jas H. Orr for Plffs.

11 Thos McPherson another witness of
12 lawful age being duly sworn &
13 sworn.

14 Quest. 1. Are you a son of the late Wm
15 McPherson.

16 The retaking of the deposition of this witness
17 is excepted to, unless in rebuttal of plaintiffs
18 rebutting evidence, and for any purpose because
19 ~~Andrew Lockhart is dead.~~

20 Orr & Blankenship, for Plffs.

21 Ans

22 I am.

23 Please state if you have any knowledge
24 of William McPherson in his life time
25 turning over any notes, orders, accounts
26 tax tickets or the like to the late Andrew
27 Lockhart in his life time to be applied
28 by the said Lockhart in discharge of

a liability that he, Joseph Willis, Stolley
Lawson & James Parsons were under
by reason of their suretyship of the said
McPherson as deputy sheriff of Jas
H. Orr late Sheriff of Lee County,
if so, please state all you know
about it?

All I know about that is what
Lockhart & my father told me.

Lockhart & father both told me that
father turned over ^{to Lockhart} enough to make
him safe as his surety to ~~McPherson~~
~~Orr~~ as deputy to Judge Orr.

Lockhart in a conversation with me
spoke of an order to H. R. Duryea,
a note on Lumberk, some tax
tickets. He said the Duryea order
was for \$300⁰⁰ & I don't know
the amount of the Lumberk note,
but it seems to me it was for
\$60⁰⁰. He did not say what amount
of tax tickets, but that there was
several tax tickets & debts turned
over to him. Lockhart said that
father had turned over enough
to make him safe, but that
he was afraid that some of
them could not be collected &
mentioned the Lumberk one as one
he was afraid he could not
collect.

~~Do you know whether the~~

1 The foregoing answer of the witness is further
2 excepted to as to what Mr. McPherson said.

3 Dr. H. Blaukenship for App.

4 Ques

5 State whether or not you know if
6 said order was accepted & paid &
7 whether or not you ever heard Andrew
8 Lockhart say any thing about it.

9 State if you know whether the
10 note on Lumberk was paid or not.

11 Ans

12 I heard Lockhart say that he had
13 the order but I never heard him
14 say whether it was accepted or
15 not. I never heard anything to the
16 contrary. I don't know of my
17 own knowledge whether the Lumberk
18 A/bk was paid or not. Jim Lumberk
19 said it was paid in coin.

20 This answer is further excepted to as to hearsay
21 by Jim Lumberk.

22 Dr. H. Blaukenship for App.

23 + Examined

24 Ques

25 Do you know by whom, or how, the two credits
26 in the judgment were paid, one for \$1000 June
27 15th 1869 and the other for \$77.00 Oct 7th 1869.

28 Ans

29 I do not.

30 Ques

31 Did Mr. Lockhart & A. R. Surgenor have a suit
32 about the order, in the Circuit Court of this County.

33 Ans

34 It strikes me they did have some trouble
35 about the order, but whether they had a suit
36 or not I do not know.

37 Re-Exam

38 Who qualified as your father's adviser?

Ans. I did.

Please state whether or not
any notes, debts accounts or tax
tickets were returned to you
by Lockhart & his representatives
or if know of any being so
returned to your father in his
life time.

Ans. There was none returned to me
& I found none in my fathers
papers. I know of none being
returned to my father in his
life time.

Re Exh.

Ques. Did you find any receipts among your
fathers papers for tax tickets, anders &c turned
over by him to Mr Lockhart.

Ans. I did not.

And further this witness saith nat.

Shos. McPherson

The further taking of these depositions
is adjourned until Wednesday the
2^d day of June 1897 at same place.

A. B. Munsey Court in Chy

Met pursuant to adjournment June the 2nd

1897.

A. B. Munsey Court in Chy

John M. Tate another witness of lawful
age being duly sworn deposes and says

Ques^d by Defendant. Please state anything you

1 may know about any Claims or Tax
2 tickets placed in the hands of Andrew
3 Lockhart by William McPherson to pay and
4 Satisfy a debt or judgment which James
5 Mc Orr held against Said William McPherson
6 and for which Said Lockhart and Joseph
7 Willis and others were security. State any
8 thing you may know or anything you
9 have heard Said Lockhart say about
10 it?

11 Ans. by witness - I can state as to
12 what kind of claims; But about the time
13 myself and A. R. Surgenus had a suit
14 pending in the circuit court of this county
15 vs Mr Andrew Lockhart had one pending
16 at the same time in one of the courts
17 of Lee co. Va or at least he said so, and
18 as well as I recollect now, it was as he
19 said a debt from William McPherson.
20 and said Surgenus was a pretty hard
21 one. He also stated I think at the same
22 time or at some time during the pending
23 of my suit. That William McPherson
24 had fell behind as an officer, and
25 that he was one of the securities, I can't
26 mind just who the others were except
27 Joseph Willis. He said to me that said
28 McPherson had placed in his hands
29 some debts to make him Harbors or se-
30 cure, but that he feared he would have
31 trouble with them and not collect them
32 and I think as my mind serves me

1 now that the Surger's Debt was one
2 of them as to the debts I came stating
3 what they were.

Witness to and for the more this defendant
Claim 82 said not.

Even Bledige
Claims 507

Geo. M. Tate

8 The further taking of these depositions
9 is adjourned until tomorrow the 3rd day
10 June 1897, at the same place.

11 A. B. Munsey Court in Chy
12 Not purpauk to adjournment &
13 no virtues appearing the further
14 taking of these depositions is
15 closed. This June 3rd 1897.
16 Virginia Lee County Court.

17 J. A. B. Munsey, Court in Chy
18

19 do certify that the foregoing deposition
20 Geo M. Tate, Joseph Willis, Thos W. P. H.
21 son & John H. McPherson were
22 duly taken, subscribed & sworn to
23 before me at the time in the
24 caption & adjournment mentioned &
25 for the purpose stated. Given
26 under my hand this June 3rd
27 1897

28 A. B. Munsey Court
29 in Chancery
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Cox & Williams Admors

vs } Depts of Defh

Jos Wilmot et al

Taken before me as Court
in Chancery and filed
June 3rd 1897

W B Manning Clerk

8 one inch 8 hours 75
#600

$$\begin{array}{r} 409 \\ 1500 \\ 600 \\ 225 \\ \hline 2839 \end{array}$$

France will be doing better in 1901

Waters House
Jan - 1900

Amos Mills

Jos. Willis et al

adrs } Depo. of
Francis Miles

Geo. T. Williams, Admin^r

Depo. of

10

-----The depositions of A. B. Munsey and

James W Orr

taken before

me, H. C. Jeshyn a Justice of Lee County Va.

by agreement at the Office of Orr & Blankenship in the town of Jonesville, Lee County, Virginia, on this the 3rd day of June 1897, to be read as evidence on behalf of the Plaintiffs in the Chancery cause of Cox & Williams, Administrators, etc., of the estate of A. J. Lockhart, deceased, against Joseph Willis et als., pending in the Circuit Court of Lee County, Virginia.

Present: Orr & Blankenship and Wm. A. Orr., Sr., counsel for plaintiffs and D. C. Sewell, of counsel for Defendants.

-----James W. Orr, a witness of lawful age being duly sworn deposes as follows:

Ques. 1. Have you heretofore given a deposition in this case ?

Ans. I have.

Ques. Did you then have before you the notice of motion for the ~~judgment~~ judgement which you obtained against William McPherson and his ~~executors~~ securities----the judgement referred to in this cause ?

Ans.-----I did not; I had searched for it in the County Court Clerk's Office, but could not then find it, but since that time have searched the office again and found it on last Monday.

Ques. 3. Did you have the Clerk of the County Court of this county to make search in his office for said notice prior to the date of your former deposition, and if so, what was the result of his search ?

Ans.---~~Yes~~ I did have him to search and he searched some in my ~~presence~~ presence and said he could not find the papers, and I at the same time searched also.

Ques. 6. I now ask you to file with your next answer an attested office copy of said notice of motion together with the return thereon, acceptance of service and Clerk's endorsements thereon ?

Objected to because if evidence at all is evidence in chief, irrelevant and immaterial---Sewell for Defendants.

Ans. I file as requested a certified copy of the said notice and return and endorsements thereon, and in addition thereto a certified copy of one of the receipts of the said McPherson for tax tickets, being tax

tickets for the year 1866, and ~~which~~ to which receipt there is appended a statement made by me and which receipt and ~~statement~~ is filed with said notice and at the foot of which statement are four credits three of which were paid by Andrew Lockhart and the other by William McPherson as shown on the said statement. Said certified copies are marked " O 1. and 2."

The statement and statements of ¹ ~~witness~~ in regard to the statement following receipt ~~is~~ are objected to as evidence because unsigned and made by only one of the parties interested--Sevell for Defendants.

Ques. 7. On examination of the list of credits above named by you I see that William McPherson only paid \$7.00, is this a part of the credit mentioned in the judgement you obtained?

Ans.--It is, a part of the \$77.00 credit.

Ques. 8. Then, I now desire to know who paid the balance of the \$77.00 mentioned in the face of said judgement?

Ans. Andrew Lockhart ^{paid} to me the \$70.00 balance of the \$77.00 credit, and he also paid to me the \$10.00 credit, June 15th 1869,

Ques. 9. Since giving your former deposition has your recollection been refreshed about any matter that you then deposed to, or should have deposed to, for want of definite recollection, and if so, state what it is, and by what means your recollection has since been refreshed?

Ans. In my former deposition I stated in answer to a question as to who paid the \$10.00 credited in said judgement, June 15th 1869, that I was rather of opinion that that credit and the other of \$77.00, Oct 1st 1869, were paid by William McPherson, though I was not positive, since that time, and since finding the original papers in the motion case and since hearing a great deal said about tax tickets, debts, etc., being turned over by McPherson to Lockhart my recollection has been refreshed in regard to matters transacted between myself, McPherson and Lockhart. In the Spring of 1869, I was notified by the Auditor of Public accounts that the balance due from me on taxes had to be paid by the 10th of May or 10th of June 1869, I am not sure which, but it was one or the other, and if not so paid he would proceed against me in the Circuit Court of the City of Richmond, I applied to my deputies for what they were in arrears, and among them William McPherson, who was in

arrears from \$800.00 to \$900.00 somewhere, and I found him in bad condition to pay ~~anything~~⁷. I talked with some of his sureties, I am sure to Mr. Lockhart, about the matter and my urgent necessity, and I went to Mr. McPherson's house to see what means he had of raising money, and in what condition the matter was as to collections and his ability to pay, and my recollection is that he had very few tax tickets that I considered worth anything, he had some Clerk's fee-bills that I took back, and I became satisfied that he was in bad condition to raise any money, and I so advised Mr. Lockhart; and I advised Mr. Lockhart to see McPherson and get what he could out of him and take charge of anything that he could ~~realize~~ realize anything on, and my impression is, though I can't remember of being present on the occasion, that Mr. Lockhart did receive from McPherson some few tax tickets and probably a debt on Harvey Lambert, and perhaps one on Ira G. Sprinkle. Mr. Lockhart to whom I looked principally, he being a man of means, undertook to raise me some money on McPherson's liability as soon and as fast as he could, and he paid me the \$10.00 June 15th 1869, but no more until October 1st 1869, and my impression when I gave my deposition before was that the two credits in the judgement, June 15th 1869, and October 1st 1869, were credits in fact to McPherson, though the principal part of ~~the~~ them were paid to me by Lockhart, and that is my impression yet, and I am now satisfied that the impression was made in this way, ^{and is correct} that those payments by Lockhart were made by him on account of tax tickets and debts turned over to him by McPherson; that he had either collected or thought he could collect, and in that way those credits were applied generally to the judgement and for the benefit of all. As stated in my former deposition I have no recollection of an order turned over by McPherson to Lockhart on ~~the~~ A. R. Surgeher, it may have been done, but if ever I heard anything of it I have forgotten it.

Ques. 10. Is it not a fact that your recollection has been further refreshed with reference to other payments made by said Lockhart in consequence of said judgement and the collection of the same?

Ans. I have in ~~my~~ my possession some receipts to Mr. Lockhart, one by William W. Sgc^u, late Sheriff of Lee County, for \$31.14 it seems to have been for his commission and cost in the case of myself against William McPherson and others, which I file with my deposition marked

" O 3; I also file another receipt marked " O 4 " for \$16.50 paid by

him, Lockhart, to C. T. Harris. My recollection is that I assigned a balance of my judgement to David Miller and he assigned some of it to C. T. Harris, and that is I suppose how it happened that Lockhart ~~made~~ the payment to Harris; I also file with my deposition a paper marked "O-6."

The exhibits are objected to because immaterial and statements made in regard thereto, because the writing is the best evidence--Sevell for Defendants.

Ques. 11. What is the difference between the date of your said notice of motion for judgement and the date of the judgement?

Obj. objected to because the record is the best evidence--Sevell for Defendants.

Ans. I refer you to the copies of judgement and notice, they show I have no doubt the correct date.

Ques. 12. What is the difference between the date of the service of said notice and the date of a deed of trust executed by Joseph Willis to W. W. Sage, Trustee, for the benefit of A. R. Sergener?

Obj. objected to for reasons above--S tell for Defendants.

Ans. I refer you to the copies that are exhibited in the cause, which I suppose give the correct date.

Ques. 13. What difference do they show?

Ans. The notice seems to have been served ~~on~~ Nov. 5th 1869, and the deed of trust seems to have been executed on the ____ day of ____ 1869 ~~xxxx~~ Nov. 1869, if this is correct there is ofcourse ____ days dif-

Ques- I have your file for dated Dec 2nd 1869, signed on your judgment, will you file same with your deposition marked O-6.
Ans- I file same marked as requested.
And further this witness saith nat.

James H. Carr

-----A. B. Munsy, another witness of lawful age being duly sworn deposes as follows:-

Ques. 1. Are you the Clerk of the Circuit Court of Lee County, Virginia, and if so, how long have you been acting and are you as such Clerk the ~~ex~~ custodian of the records of said Court?

Ans. I am Clerk of the Circuit Court of Lee County, Virginia, and have been acting as such since the 1st of July 1893, and as such I am the custodian of the records of said Circuit Court.

Ques. 2. Have you examined the records of said Court in your office for a judgement or judgements in favor of Andrew Lockhart against A. R. Sergener, and if so, have you found any, and how many ?

Ans. I have made search and found two judgements, one at the August term 1877, in favor of said Lockhart and ~~in favor~~ against said Sergener for the sum of \$197.00 with interest and costs, a copy of said ~~judgment~~ judgement I file with my deposition marked " M 1; " I also find another judgement against A. R. Sergener and S. S. Sergener at the March term 1880, on a forthcoming, which I am of the opinion was a judgement on a forthcoming bond given on the judgement first above mentioned, I find no other judgement on which a forthcoming bond could have been taken; a copy of this last judgement is also filed herewith marked " M 2. " *The opinion of the witnesses & statements in regard to judgement are objected to, because the judgement*

Ques. 3. Do you find any other judgement of record in your office in favor of said Lockhart against said Sergener ?

Ans. I do not.

Ques. 4. Have you searched in your office for the papers of the case in which the first judgement you mention was rendered, also for the forthcoming bond on which the last one was rendered, and if so, have you found them ?

Ans. I have searched for said papers and have ^afiled to find them. I have found a file of causes decided at the August term 1877, but the ~~ppr~~ papers of the original cause between Lockhart and Sergener is not in that file, and the forth-coming bond is not in the file of causes decided at the March term 1880. I do not remember to have seen any of the papers in these two causes.

Ques. 5. Have you examined the Attorneys memorandum book ~~xxx~~ from Nov. 25th 1874 to April 1880, and if so have you found any memorandum of a suit brought by Andrew Lockhart against Abraham R. Sergener, and if so about what date does said memorandum seem to have been made ?

Ans. I have thoroughly examined said memorandum book from Nov. 25th 1874 to April 1880, and find but one memorandum of a suit brought by Andrew Lockhart against Abraham R. Sergener, and it seems to have been sometime in November 1874, or in the first part of December of same year. The memorandum is in the handwriting of C. T. Duncan and is signed " Morrison & Duncan."

Handwritten note on right margin:
a copy of the judgement in the case of Lockhart vs. Sergener is filed with the deposition of the witnesses.

Quas. 6. Will you please file a certified copy of said memorandum with your deposition marked " 113? "

Ans. I file herewith said certified copy marked as requested.

-----And further this deponent saith not.

*Witness claims
1 day 50 cts.*

A. B. Munsey

Virginia, Lee County, to wit:-

I, H. C. Joslyn, a Justice of the Peace in and for the county of Lee in the State of Virginia, do hereby certify that the foregoing depositions of James W. Orr and A. B. Munsey were duly taken, sworn to and subscribed before me at the time and place and for the purposes mentioned in the caption of the same. Given under my hand, this 3rd day of June 1897.

Henry C. Joslyn
J. P. in and for Lee Co., Virginia.

Boyd & Williams
Admrs et al
vs. 3rd Chancery
Joseph Willis et al

The depositions of
James W. Orr &
A. B. Munsey.

Received from H. C. Joslyn
the P before taken
taken and filed June
4th 1897
A. B. Munsey Clerk

J. P. Lee. \$1.50

8
To Joseph Willis and J. W. Glass:

You will please take notice that I will take the depositions of J. W. Orr & others at the Land Office of Orr and Blankenship in Jonesville, Lee County, Va., on Monday the 5th day of October, 1896, between the hours of 8 A.M. & 4 P.M. of that day, which depositions when taken are intended to be read as evidence on our behalf in a certain suit in Chancery now pending in the Circuit Court of Lee County, Va., wherein we are plaintiffs and you are defendants; and if for any reason the taking of said depositions be not begun on that day, or if begun and not completed, the taking of the same will be adjourned from day to day, between the same hours, and from place to place, till they are finished.

^{Sept}
~~August~~ 11th, 1896.

Respectfully,

N. S. Cox &

A. C. Williams, Attorneys
of Andrew Lockhart, dec'd

By

Counsel

Orr & Blankenship &
Wm A. Orr Es.

Coy & Williams Adams

vs } Notices to take
} Depositions

Joseph Willis et al

Oct 5th 1896,

We accept legal service
of the within notice
Sept 11th 1896.

Executed in witness

whereof the said

to Joseph Willis et al

at St Louis Mo

September 21st 1896

Respectfully

John S. Adams

Attorney

for

1

The depositions of James W. Orr, Thomas,
McPherson, France Ables. S. V. H.,
Richmond,

taken before me, H. C. Joslyn a Justice
for Lee County, Va, pursuant to notice hereto annexed,
at the office of "Orr & Blankenship" in the town of
Jonesville, Lee County, Va, on the 5th day of Octo-
ber, 1896, between the hours of 9 A.M. & 4 P.M., to be
read as evidence on behalf of N. S. Boy and
A. C. Williams, Administrators of the Estate of
Andrew J. Lockhart, deceased, in a certain
suit in Chancery now depending in the Circuit
Court of Lee County, Va, wherein the said N. S. Boy
and A. C. Williams, Administrators are plaintiffs
and Joseph Willis et al are defendants.

Present: I, W. A. Orr, Sr., and H. W. Blankenship of Coun-
sel for plaintiffs, and

That McPherson,
J. W. Orr, a witness of lawful age being

1st duly sworn deposes and says as follows:

1 Ques- What is your age and occupation and what
~~was your occupation in the years 1871-2-3 & 4?~~
were you acquainted with A. R. Surgenor & Joseph
Willis in the lifetime of said Surgenor?

Ans. I am 52 years old. Am a farmer.
I was acquainted with both,

2 Ques. Did you hear a conversation between them in
reference to a deed of trust executed by said
Willis for the benefit of said Surgenor and

if so, when and where was it, and what was said:

This question & any answer thereto is objected to, because irrelevant & immaterial & because that question is not involved &c.

Friedmane Russell for
Willis.

Ans. I did hear a conversation between them, before Mr Surger's death, and in that conversation, Mr Surger stated that Mr Willis had paid him, the deed of trust. Mr Surger said it would not ^{do} for him to lift the deed of trust, if he did Mr Lockhart would move against him. This conversation took place at Mr Surger's house, and it was 4 or five years before Mr Surger died. Myself and Mr Willis went there to see Mr Surger about the deed of trust. I don't remember exactly when Mr Surger died but am told that it was in the year 1885.

And further this deponent says not.

Witness - Cloins
1 day 50 cts

Thos. McPherson

James W. Orr another witness of lawful age being first sworn depose and says:

19- What is your age and occupation?

Ans. 55 years. Lawyer &c.

2nd Q^{ues} Was you the plaintiff in the judgment filed in this suit as exhibit "A"?

Ans. I was

3rd Q^{ues} - Is it paid and if ^{you} answer that it is who paid it?

This question is excepted to, because the record shows the fact enquired of
Evidence of Sewell

Ans. The fact is paid. Mr A. Lockhart paid it, unless it was a small payment made by Stokely Lamson. My recollection is that Stokely Lamson did make a small payment on the judgment.

4th Q^{ues} What relations did the parties defendant sustain to each other in said judgment?

This question & any answer thereto is excepted to, because the records ^{in the book for judgment} shows the fact enquired of & is the best evidence.

P.V. for Willis

Ans. Mr McPherson was principal, and the others were his sureties in his hands ^{or hands} as deputy Sheriff to me as Sheriff of Lee County.

5th Ques - Who paid the \$18 - Credits in said Judgment
June 15th 1867?

Ans. I am rather of opinion that that credit and
the other of \$77.00 Oct 1st. 1867, were paid
by Wm McPherson, though I am not positive.

6th Ques Have you any evidence as to amounts
and dates of payments on this judgment
if so file same?

Ans. I have an execution issued on this Judgment
returnable to Feb Rules 1875, on which are
endorsed several credits which I file with
my deposition, marked "Execution". I also
file a receipt for \$25.00 to Andrew Lock-
hart by W. A. McKee D. S. for use, dated June
21st 1875. Marked "Receipt". As to the \$30.00
credit on said Execution by L. S. Burk, my
recollection is that payment was made
by Mr Burk for said Lockhart.

7th Ques Who paid the other sums as credits on the
Execution filed with you last answer?

Ans. As before stated, Wm McPherson may have
paid the credits before the Judgment, that is the 3
first ones, but - Andrew Lockhart paid all
the payments after Judgment, unless it was a
small one paid by Stohely Lenson.

8th Ques Who made the payment of \$25 - on June 21st
1875 I mention in the exhibit "Receipt" refer
to by you?

(5)

Ans. The receipts show, Andrew Lockhart.

9th Ques— Do you remember any other sum of money paid you by Andrew J. Lockhart on this Judgment?

Ans. I can not say that I remember any other particular sum.

10th Ques— Was you once Clerk of the County Court of Lee County, Va, and as such the Custodian of the Book & land books of said County?— and if so during what years?

Ans. I was Clerk of said Court from Jan'y 1st 1871 to July 1st 1881. and custodian of said books.

11th Ques— Did or not A. J. Lockhart frequently consult and advise with you as to the chance to set aside a deed of Trust executed by Joseph Willis to Wm. D. Sage & wife for the benefit of A. R. Surgenus, deceased, while you was Clerk?

This question & any answer thereto is excepted as immaterial, self serving & not admissible. The information sought being now of record in the Circuit Court Clerk's Office of Lee County in a decided Chancery cause in which Joseph Willis was Plaintiff, & Jas H. Orr, the witness, & admin of A. R. Surgenus dec'd was defendant, & decree final in favor of Willis. Said cause entered

in order book on ~~page~~ 583
on Nov. 27th/1886.

Pt for Willis

- Sub. He did frequently during that time talk to me about trying to collect from Joseph Willis his part of said judgment, but the deed of trust was in the way, and he did not take any legal steps that I ever heard of.

12 June - I have ^{Office} searched the Clerk, of said County ^{Court} since this suit was brought to see whether or not the said deed of trust (filed with plaintiff's bill as exhibit "D") has been released, satisfied, or, any decree entered in the deed book or books, showing the same null and void?

- Sub. I have.

13 June Is there any record in said Clerk's Office which gives notice that said deed of Trust has been released, ^{satisfied}, paid, or declared null and void?

This question may answer thereto is excepted to because the record is the best evidence, especially the book above referred of record in the Circuit Court of Lee County Va.
P. Sewell for Willis

- Sub. There is not that I could find.

14 Ques - Referring to Objections to question "11" and your answer thereto, and to the final decree therein rendered and to the suit in which said decree was rendered - You are then asked if either A. J. Lockhart or his heirs or his administrators or either of them were parties to said suit?

This question is objected to because the suit of record in the Lee County Courts Clerk's office is the best evidence of P & S for Willis.

Ans They were not.

15 Ques - Will you please file a copy of said final decree in said suit with your next answer?

Ans I will file said copy as requested marked "Decree".

16 Ques - Stokely thinks also you may know about this case?

Ans - Mr Andrew Lockhart informed me that Stokely Lamson had settled with him his part of said Judgment, that is one third or such sum as Lockhart received from him perhaps on a compromise as to his one third. He also stated to me often that Joseph Willis ^{James M. Parsons} never said him anything on account of said Judgment. I know the fact that James M. Parsons was considered -

insolvent and so was Willis, as to personal property, and his land was encumbered by the said deed of trust, until set aside, and I never gave said Lockhart or his Admrs any information as to the decree in the case of Joseph Willis or James W Orr Admrs.

This answer is excepted to because the statements of Lockhart, ^{and Larsson} are hearsay self-serving & it is immaterial whether witnesses gave information of the decree. It was of record.

17 June P.O. for Willis -
What was the assessed value, for taxation, of the real estate of Joseph Willis for the year 1869?

This question & answer thereto is excepted to because misleading as ^{is not reliable estimate of the value} ~~that taxable value is always very low~~ & because the records are both immaterial. P.O. for Willis.
Ans. The land book for that year shows 62 Acres at \$2.00 per acre, 325 A. @ \$3.00 and 257 A. @ \$1.00 per acre.

Cross examined -

Do you not know the fact that Wm McPherson, in his lifetime turned over a large amount of

Judgements, receipts, or attys &c
a part of which was in
the late J.R. Surgenor, to Andrew
Lockheart, which were to be
by him collected and paid in
the judgement set out in its
bill?

Sus No I do not know about that.

2 ~~Do you~~ ^{3rd} remember the personal
estate owned by Jo. Willis
during the years this judgement
was in force?

Sus I do not.

3 Are you or were you acquainted
with the real estate owned by
Jo. Willis during the same period?

Sus I know something of the land on which
Willis lived, that I suppose was his, but
do not know the amount, or the value
thereof.

4 Is it not a fact that he has
lived upon the same farm he
now lives upon, and has claimed
it as his own for 30 or more
years?

Sus I have not been there for several years,
perhaps not since 1883, the last I knew
of him he lived on or near the old Bledsoe
place. I don't know where he now lives;

5. Have you not frequently heard Andrew Lockhart say in his lifetime that he suspected and believed that the deed of trust from Jo Willis to W. W. Sage Trustee for the benefit of A. R. Surgermer, was fraudulently made to hinder delay & defeat said Willis Creditors?

- Ans - Yes I have heard him say he believed it was fraudulent and was intended to defeat the collection of Willis part of this judgment.

6 Please look at the copy of deed of trust filed with the bill of the plff, and the date of the rendition of the judgment and see if the deed of trust is not some two years older than the judgment?

Ans The deed of trust is dated 10th of Nov 1869 and the judgment, see Exhibit "A" is dated Nov 19th 1869, There is a mistake in Exhibit "B" as to date of judgment.

7 Please give the date of your last payment & the date of the last execution issued on said judgment?

Ans. The last Execution issued Dec 5th 1874, according to the Execution Book, and the date of the last payment as shown on this Execution was Aug 26th 1875.
Re Examined by Plff.

1 When did A. Lockhart die?

Ans. I think in 1881.

2 Did he frequently tell you that he could not prove that said Bond of Grant was fraudulent?

This question & any answer thereto is excepted because hearsay, self-serving & inadmissible.

W. J. Miller.

Ans. Yes he has so told me often, and frequently talked to me about trying to find evidence to prove that fact, but never did find such evidence that I know of or ever heard of. And further this deponent birth not.

James W. Orr.

The further taking of depositions in this case is adjourned until tomorrow Oct 6th 1896. at the same place.

This Oct 5th 1896. H. C. Foslyn J. P.
Met pursuant to adjournment on this Oct 6th 1896. at the office of Orr & Blankenship.

France Miles another witness
of lawful age being duly
sworn deposes and says,

1st ques. What is your age, Occupation
and Residence.

Ans. I am 53 years of age. I am
a Blacksmith, and live at
Jonesville Lee Co Va

2^d que Were you acquainted with the
late A. R. Surgeson, and are
you acquainted with Joseph
Willis, and were you frequently
together.

Ans. Yes.

3^d ques. Did or not ^{you} ever hear said
Surgeson say, whether or not
he claimed anything from Joseph
Willis, under a deed of Trust
he held against said Willis
and when was it.

Objected to because immaterial.
Pridemore & Lowell.

Ans. I heard him Surgeson say, that
he held a deed of trust against
Willis, but that Willis did
not owe him anything on
it. The conversation took place
in Jonesville, and was a

(13)

Year or two before Mr Surgerman died,

Ques 4. Did or not you ever hear Joseph Willis say that he did not owe Mr Surgerman anything, by reason of this deed of trust or anything else.

Ans. I dont think I ever heard Mr Willis say anything about it anyway

Ques 5 Did you or not at the time of the conversation with Mr Surgerman spoken of, ask him why he took the deed of trust, and if so what was his reply. Objected to become hearsay and immaterial

Rideman & Sewell

Ans. I think I was Constable at the time, ~~any way~~ I had some business with him, and when I saw Mr Surgerman again, I asked him about his deed of trust, and he replied as stated above. I then asked him what he was doing with the deed of trust, and as well as I remember he said, Oh that is for a purpose.

~~Cross Examined~~

And further this deponent with not.
Witness claims ^{of} Lawrence Miles
1 day 50.cts

The further taking of depositions
in this case, is adjourned until
tomorrow Oct 7th at the same
place. This Oct 6th 1896.

H. C. Foslyn J.P.

No witness appearing to testify in
this case. The further taking
of depositions ^{in this case} is adjourned
until tomorrow Oct 8th 1896.
at the same place.

This Oct 7th 1896.

H. C. Foslyn J.P.

The further taking of depositions
in this case is adjourned until
Friday Oct 9th 1896. at the
same place.

This Oct 8th 1896.

H. C. Foslyn J.P.

Met pursuant to adjournment
on this 9th day of Oct 1896.
at the office of our & Blountshire
Present W. A. Orr for the Plffs.
and S. C. Sewell Counsel for
the defendant.

- J. W. Richmond another witness of lawful
being first duly sworn deposes and says:
- 1 Please state whether or not you are
Clerk of the County Court of Lee County,
Va, and if you say you are then
state whether or not you are as
such Clerk the Custodian of the Deed
Books of said County, the land
books of said County and the
Judgment Lien Books of said
County?

Ans. I am Clerk of said County
and am Custodian of all
the books above named.

- 2 Is there any thing on said Deed
Books showing that a deed of Trust
executed by Joseph Willis to W. W. Sage
Trustee for the use of A. R. Surgenor,
dated November 10th, 1867, is or has
been released, paid or declared
null and void? - Also state whether
or not you have searched to see?

This question & answer is objected to
because immaterial & because
the information here sought is
in case above referred to in
the Circuit Court Clerk's
office.

D. B. Sewell
for Willis

Ans. I have searched the books in my office, and from deed book No 16. where said deed of trust is recorded. up to and including the last deed book, and find no deed of release, or anything else showing that it was paid or declared null and void.

3 Is there any entry on your Judgment Lien docket showing that said deed of trust is paid, released or declared void?

Objected to because immaterial and because not the duty of the ~~Willis who represents~~ Defendant to make such releases.

D. C. Sewell

For Joseph Willis.

Ans. I find nothing indexed, in the name of J. W. Orr Adm. at the suit of Joseph Willis, and nothing in the name of Joseph Willis against J. W. Orr Adm.

4 Have you made an attested transcript from the said land book showing the tracts of land charged for taxation to said Joseph Willis for the years 1869, 1880 and 1891?

Ans. Objected to because immaterial, misleading. (only certain years being selected) and not complete as to all the years. &c

S. C. Sewell for Sept.

Ans. 2 hore. and 2 file 1th same marked "Richmond"

5- But any land book in your office show any other land charged to said Joseph Willis than the tracts of land shown in said Transcript since the year 1869?

Ans. I dont know. I have not searched all the land books up to that date, only these three.

And further this deponent with not

Witness claims S. V. F. Richmond.

1 day 50 cts.

State of Virginia. See County To-wit. D. Henry C. Foslyn a Justice of the Peace for said County. do hereby certify that the foregoing depositions of Thomas McPherson James W. Arr. France Miles. and S. V. F. Richmond were duly taken. Sworn to and Subscribed. before me.

at the time, and place mentioned
in the caption of the same.
Witness under my hand. This
9th day of October 1896,

Henry C. Foslyn G. D.

N. S. Cox & A. C.
Williams Adams
vs. In Cheq
Joseph Willis et al

The depositions of
Thomas M. Pherson
James W. Orr
Leander Miles &
S. V. Jr. Richmond

Received of H. C. Joslyn
the J. D. for whom
taken and filed Oct
10th 1896
A. B. Munsey et al

Copy -

Costs.	
Justice	\$ 5.25
witnesses	\$ 1.50
Sheriff	40

The deposition of ^bWarney Lambert, taken by
Consent of parties at ~~his~~ ^{of Mr. Price} residence, before
the undersigned Justice of the Peace of Lee
County Va, on the 4th day of June 1897. To
be read as evidence in the Chancery Cause
of Cox & Williams Admors &c against
Joseph Willis et als. pending in Lee County
Circuit Court, & on behalf of Plaintiffs.

The said ^bWarney Lambert a witness of
lawful age and being duly sworn deposes
and says.

Question by Plffs.

Did you ever pay to Andrew Lockhart a debt
that you formerly owed to Mr McPherson.
If so state when it was and what was
the amount of said debt.

Answer. I did pay Andrew Lockhart a
debt. which I owed to William
McPherson. It is my recollection
and impression, that it was
the McPherson debt. I paid him
either 15 or 17 bushels of Corn
at 75 Cents per bushel. I paid
this debt a long-time ago. I
think it was in the year 1873.
or 1874. any-way it was before
Martin Drake was Robbed, and

the reason I speak of Martin Drake is that Mr Lockhart had been getting Corn from Drake for 50 Cents a bushel and he told me he would rather pay me 75 Cents a bushel, than haul the Corn so far. I know it was before Drake was robbed. The debt was the balance of an execution Mr. Pherson had against me, while he was an officer, and it came into Mr Lockhart's hands in that way.

And further this deponent with not.

Witness claims
1 day 50 cts.

Harvey C. Lambert
^{his}
_(marks)

Virginia Lee County So. Wit.

I, Henry C. Foslyn a Justice of the Peace for said County and State do Certify that the foregoing deposition of Harvey C. Lambert was duly taken. Subscribed and sworn to before me at the time and place mentioned in the Caption of the same, given under my hand this 4th day of June 1897.

H. C. Foslyn J. P.

Boyd & Williams
Administrators vs.
vs. } In Chancery

Joseph Willis et al

The deposition of
Harvey C. Lambert

Received from H. C. Joslyn
the J. P. before whom taken
and filed June 4th
1897
A. B. Munsey Clerk

J. P. Fee \$1.50

Cox and Williams, administrators, etc.; Plaintiffs.

Against----- (In Chancery. (Circuit Court of Lee County, Va.)

Joseph Willis, Defendant.

-----The deposition of S. V. F. Richmond taken at the office of Orr & Blankenship by agreement of parties, in the town of Jonesville, Va., to be read as evidence on behalf of the Plaintiffs in a certain suit in Chancery pending in the Circuit Court of Lee County, Virginia, wherein Cox and Williams, administrators, etc., are plaintiffs and Joseph Willis is defendant, before me, H. C. Joslyn, a Justice of the Peace in and for the County of Lee, and State of Virginia, on this the 27th day of February 1897.

~~xxxxxxx~~

Present: Orr & Blankenship, and W. A. Orr, Sr., counsel for Plaintiffs, and D. C. Sewell, of counsel for Defendant.

S. V. F. Richmond, a witness of lawful age, being first duly sworn, deposes and says:

Ques. 1. I now hand you copies of warrants and executions against Joseph Willis with returns endorsed on said executions. Will you please file the same with your deposition marked " S. V. F. R. 1, 2, 3, and 4, respectively ? And I also hand you copies of executions against the same party and returns endorsed thereon marked " S. V. R. 5, 6, and 7," respectively; also copies of two deeds of trust one to John M. Tate, ~~xxxxxxx~~ Trustee marked "S. V. R. 8, " and the other to A. C. D. Maness, Trustee, marked " S. V. R. 9 " and purporting to have been executed by the said Joseph Willis. Please file all these with your deposition marked as aforesaid ?

(At this point D. C. ~~xxxxxxx~~ Sewell of counsel for the defendant asked plaintiffs' counsel to have the witness file a copy of the note to A. L. Pridemore secured by the said deed of trust to said John M. Tate, Trustee, and ~~xx~~ Plaintiffs' counsel declined to file said copy, not deeming it proper for them to do so, and not desiring to do so, when Mr. Sew-

ell insisted for them to do so, and that there was an agreement with J. W. Orr, of counsel for the Plaintiffs that said copy should be filed along with said copy of said deed of trust, but said Orr contended that there was no such agreement, that the agreement was ^{that} ~~for~~ the defendant's counsel ^{might} ~~to~~ file said copy or ~~to~~ show that said note had been nearly paid.* Said Sewell thereupon stated that he would no longer consent to the taking of this deposition, and with drew from the room, and by ~~rx~~ request of Plaintiffs counsel the taking of said deposition was ~~xxxx~~ proceeded with.

W. E. Forlyne, J. P.)

Ans. I here file the said copies as requested and marked as stated in the foregoing question, as part of my deposition.

Ques. 2. I now hand hand you a transcript from the execution book ~~xxxxxx~~ No. 6. kept in your office as Clerk of the County Court of Lee County, Virginia, showing a return ~~xxx~~ by a Deputy Sheriff of an execution against William McPherson and Joseph Willis, May rules 1877. Please file the same with your deposition as part thereof marked "S. F. T. 10."

Ans. I here file the said transcript as part of my deposition marked as stated in question 2.

Ques. 3. Have you searched for the said execution in your office and found the same or not?

Ans. I have searched for the same in my office, but do not ~~x~~ find it.

Ques. 4. Are you the Clerk of the County Court of Lee County, Virginia, and as such the custodian of the records and papers of said office?

Ans. I am.

And further this deponent saith not.

J. W. F. Richmond, Clerk

Virginia, Lee County, to-wit:

I, Henry C. Joslyn, a Justice of the Peace in and for the County of Lee, in the State aforesaid, do ~~ex~~ hereby certify that the foregoing ~~de~~ deposition of S. V. F. Richmond, was duly taken, sworn to before me and subscribed in my presence, at the time and place and for the purposes stated in the caption of the same. Given under my hand this the 27th day of February 1897.

Henry C. Joslyn, J. P.

Levy and Williams Admin's

Depts. of

vs. J. V. F. Richardson

Leah

Joseph Willis et al

Received from H. C. [unclear]
The J. P. before whom taken
and filed Feb 27th 1897.
A. B. Murray Clerk

Depts. Depts
Return the

J. P. F. C.

The within depositions are excepted to for want of notice or agreement to take the same. The agreement to take this testimony was subject to the exception to be made by the defendant - that is testimony in chief and not in rebuttal and therefore not admissible. That if the deed of trust securing the debt to A. L. Pridemore was filed, then that the note thus secured and in the possession of D. C. Sewell should with the Creplets thereon be filed show how much was paid. This agreement not being complied with the depositions are excepted to.
Pridemore Sewell

Virginia: At a Court of quarter sessions continued -
and held for Lin County, at the Court house thereof on
Friday ~~the~~ 19th day of November, 1869.

James L. Orr
vs

Deft

Motion for money
collected by Wm
M. Parsons and
not paid over

Wm M. Parsons, James M. Parsons,
Joseph Willis, Stubby Parsons,
and Andrew Lockhart, - - -

Deft

This day came against the plaintiff, by
his attorney, and the defendants failing to appear, although
specially called, and it appearing to the Court that the de-
pendant William M. Parsons has collected taxes, licenses,
fre-bills &c. to the amount of \$43.93, which he has
failed to pay over, to the plaintiff, as required by
law. It is therefore considered by the Court that the
plaintiff recover against the defendant \$43.93, with
legal interest on \$211.81, part thereof, from the 15th day of
March, 1867, and the like interest on \$349.60, another
part thereof from the 15th day of March, 1868, and the
like interest on \$282.52, the residue thereof, from the
15th day of March, 1869, till paid, and the costs
of this motion - subject to the following credits viz:
\$10.00 paid June 15th 1869, and \$77.00 paid October
1st 1869.

A copy

Test. C. V. F. Richmond Clerk

lit. 870

vs copy of 1840

Joseph Willis et al

("A")

C 70-

Date of Judgment.

Nov. 19th 1867

Style of Suit names, descriptions and Residences of the parties

James W. Orr of Lin County, Virginia, Plaintiff
against

Wm M^cPherson, Stobely Lawson,

James M. Parsons, Joseph Willis

and Andrew Lockhart. Defendants

Judgment
in debt

Amount of Judgment Credits &c.
Judgment for \$843.93 with interest on \$211.81
from 15th day of March 1867, and interest
on \$349.60 from March 15th 1868, and
interest on \$282.52 the residue from
March 15th 1869 till paid and the
cost \$7.31, subject to the following
credits - \$10. as paid June 15th
1869 and \$77 as paid Oct 1st
1869

Date of docketing Judgment,

1872

November 29th

D. S. V. F. Richmond, Clerk of the County Court of Lu County, Va
do hereby certify that the foregoing is a true transcript
from the records This 29th day of Nov 1896.

D. S. V. F. Richmond

J. L. Orr
vs. Copy of Judge
Joseph Willis et al

17

C 25

Booklet p. 71

Virginia: In the clerk's office of the County Court
of Lu County.

James W. Orr

vs

Judge & Ex- on a Motion
W^m M^cPherson, Storey Lawson,

James M. Parsons, Joseph Willis
and Andrew Lockhart

J. S. V. F. Richmond

Clerk of Said Court do hereby certify that
the following return appears on my ex-
ecution book as entered from the final
execution issued on said Judgment,
to-wit: "The balance collected in full from
A. Lockhart amounting to \$41 ³⁹ Dut
principal and all costs which which was
paid to C. J. Harris by the orders of
David Miller August 26th 1875

W. A. M. Baker D. S

for C. L. Hamblen "

Given under my hand, this the 2nd
day of May, 1876

J. V. F. Richmond Clerk

J. L. S. 1850

28 Copy of return
on file for
H. Lockhart et al

6

June 25th

Virginia: At a county Court begun and
held for Lin county at the Court-house thereof
on Tuesday Sept 2nd 1889.

It appearing to the Court that Mary
Lockhart widow of A. J. Lockhart, deceased,
relinquishes her right to the administra-
tion of the estate of her deceased hus-
band in favor of A. C. Williams and
N. S. Cox of the County of Lin; and on the
motion of the said A. C. Williams and
N. S. Cox who made oath thereto, and together
with A. W. Harris, John W. Scott and H. C.
Joslyn their securities who qualified
as to their sufficiency, entered into and
acknowledged a bond in the penalty of
\$2000 with conditions according
to law, Certificate is granted the said A. C.
Williams & N. S. Cox for obtaining letters
of Administration on the estate of the
said A. J. Lockhart, in due form.

A copy

Teste - S. V. F. R. Richmond Clerk.

A. C. Williams et al

Letters of Administra-
tion

"E"

Williams & Corp. Admins

Q-8

Joe Willis

In Chy

176.258

This Deed made and entered into this the 18th day of February 1874, by and between Joseph Willis of the County of Lee and State of Virginia, of the one part, and C. V. Young trustee of the other part, both of the County of Lee and State of Virginia of the other part. Witnesseth that for and in consideration of one dollar in hand paid and the further consideration of the debts hereinafter mentioned the final payment thereof to the deferent parties hereinafter mentioned and the and the further sum one dollar in hand paid by C. V. Young Trustee to the said Joseph Willis the receipt whereof is hereby acknowledged the said Joseph Willis hath and doth by these presents give grant bargain and sell and convey to the said C. V. Young trustee as hereinafter mentioned the following land lying and being in the the County of Lee and State of Virginia on the waters of a certain tract or parcel of land known as the Alexander Hamilton farm and bounded as follows and said to contain one hundred acres more or less under the north side of Powels Mountain, Beginning at two lines on the top of powels mountain thence north 21 west 52 poles to a stake between a Sugar tree and lym marked as pointers on the North side of said Mountain thence North 22 west 80 poles to a lym in Tylors line and with said

line north 65-East 114 poles to a white walnut
Buckeye and thence thence South 25-east 132
poles to a stake on top of Powells mountain
thence with the top of said mountain to the
beginning and I by this presents convey all
right title interest that I have in the lands
above mentioned to the said C. V. Young
trustee as aforesaid free from the said Jo-
seph Willis his heirs and assigns forever.
nevertheless subject to the following condi-
tioned and trust whereas the said Joseph
Willis is indebted to Claiborn Young in the
sum of twenty-six dollars and nine cents
due the first of Jan 1861 and to R. D. Young
the further sum of sixteen and eighty-
three cents due the 28th of Nov. 1872 and to
C. Young & sons in the further sum of fourteen
dollars and fifty nine cents due the 1st of
Jan. 1875 now the said Joseph Willis shall
well and truly pay and discharge the
said debts and interest thereon to the dif-
ferent parties here in before mentioned
within 10 months from this date and save
harmless the different parties and pay of
all said debts and the cost of making re-
cording this deed including commission of
5-cents on each doll to the trustee and
in case the debts herein contemplated is
not paid within the time mentioned
then it shall be the duty of the trustee af-
ter giving reasonable notice of the time
and place sell the land heretofore de-

cribed for cash in hand and satisfy said debts here are excess remaining is to revert in said Willis given under our hands this the 18th day of February 1874.

Test

Joseph ^{my}~~mate~~ Willis (Seal)
C. V. Young (Seal)

Lee County Virginia This day Joseph Willis and C. V. Young whose names are signed to the writing above being dated the 18th day of February 1874. have acknowledged the same before me in Lee County Virginia this the 18th day of February 1874.

G. C. Duff, J. P.

Virginia,

Lee County Court Clerk's office the 23rd day of March 1874. The foregoing Deed of Trust between Joseph Willis of the first part, and C. V. Young trustee of the second part, both of Lee County Virginia, is admitted to record upon the certificate of G. C. Duff a Justice of the Peace, in and for the County and State aforesaid.

Teste - John H. Gibson C. C.

A copy, Teste: S. V. F. Richmond & Levens

C. V. Young & Fratt
From Copy of Record
Joseph Willis
Feb 7/97

Class 80

Filed with France
Wiles' deposition
Feb 18/97.

This deed made this 21st day of September 1874 between Joseph Willis of the first part, and James M. Stamper of the other part all of the County of Lee and State of Virginia. Witnesseth that the said Joseph Willis in consideration of the sum of one thousand dollars to him in hand paid by the said James M. Stamper, cloth bargain, sell, deliver and convey unto the said James M. Stamper all his right and titles in and unto to two certain tracts or parcels of land lying and being in the said County of Lee of the waters of Wallens Creek and on the North side of Powells Mountain supposed to contain one hundred acres of land, and bounded as follows to wit:- Beginning at two Lynns on the top of Powells Mountain Thence N. 21 W 52 poles to a stake between a Sugartree and Lynn marked as pointers on the north side of said mountain Thence N. 22° 80 poles to a Lynn in Taylors line and with the same N. 65 E. 114 poles to a white walnut, buckeye and Lynn, thence S. 25 E 132 poles to a stake on the top of said mountain, Thence with the top of said mountain to the beginning to have and to hold the said Tract of land unto him the said James M. Stamper and his heirs forever, with all the appurtenances to and with said Tract of land to the said James M. Stamper and his

heirs doth warrant and forever defend
against the claim or claims of the said
Joseph Willis his heir administrators
and assigns and against the claim or
claims of all and every other person
whatsoever. In testimony whereof the
said Joseph Willis hath hereunto set
his hand and seal the day and year
above written. It is to be understood
by the party of the second part, and a-
greed to by the party of the first part
should it turn out that any of said
lands should be recovered by A.E. Jackson
and wife & others in their present action of
Ejectment or any other claim or claims
whatsoever the said Joseph Willis binds
himself his heirs & to pay all expenses ac-
crued therein. It is also understood the
land stands for the purchase price of the
same until paid.

Joseph ^{his} Willis (Seal)
^{mark}
Riziar ^{her} Willis (Seal)
^{mark}

State of Virginia, Lee County, to wit:

I, Thomas McPherson a Justice of the
peace for the County aforesaid in the State
of Virginia do certify that Joseph Willis
whose name is signed to the writing a-
bove or hereto annexed bearing date on
the 21st day of September 1874 has acknowl-
edged the same before me in my County
aforesaid given under my hand this the
5th day of October 1874.

Thomas McPherson J.P.

State of Virginia, Lee County, to wit:-

We Thomas McPherson and Stokley Lawson, Justices of the peace for the County of Lee in the State of Virginia do certify that Kizgiar Willis the wife of Joseph Willis whoes names or singued to the wrighting above or hereto annexed bearing date on the 21st day of Sept. 1874 personally appeared before us in the County aforesaid and being examined by us privally and apart from her husband and having the wrighting aforesaid fully explained to her she the said Kizgiar Willis acknowledged the said wrighting to be her act and declared that she had willingly executed the same and do not wish to retract it given under our hands this the 7th day of October 1874.

Thomas McPherson, J.P.

Stokley Lawson, J.P.

Lee County Court Clerk's Office the 27th day of Nov. 1874. The foregoing deed between Joseph Willis & Kizgiar his wife of the first part & James M. Stamper of the second part, all of Lee County Va. was this day filed in this office and admitted to record upon the certificates of Thomas McPherson & Stokley Lawson two Justices of the peace in and for the County and State aforesaid.

Teste - John R. Gibson, C.C.

A Copy Teste J. T. F. Richmond Clerk

James M. Stauffer
From - Copy of Deed
Jas Willis
D 12 17 page 85

Chas Root

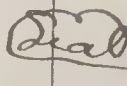
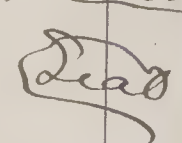
Filed with Joseph Willis
Deho.

This deed made and entered into on this 10th day of November 1869 between Joseph Willis of the County of Lee and State of Virginia, of the one part, and William W. Sage, of the County and State aforesaid, of the other part, witnesses, that the said Joseph Willis for and in consideration of the sum of one dollar to him in hand, the receipt whereof is hereby acknowledged, as well as in consideration of his indebtedness hereinafter named, doth grant unto the said William W. Sage for several tracts or parcels of land lying in said County and the East fork of Blackwater, being the same tracts or parcels of land to which the said Joseph Willis obtained title as follows, that is to say, one tract of four shares in in the land formerly owned by Sampson Bledsoe which was allotted and confirmed to said Willis by decree of Court; another tract of about 60 acres deeded to said Willis by James Bledsoe; another tract of about 50 acres deeded to said Willis by Isaac Bledsoe; and another tract bought of Elias Bledsoe of about 115 acres, for which the Court decreed said Willis a title with all the appurtenances, do Trust to secure the payment of the sum of four hundred and fifty ^{seven} dollars and thirteen cents, with interest from this date, to Abram R. Surgenor on or before the 1st day of January 1872, which said sum & interest is due & owing from the said Willis to the said Surgenor; and also to secure and indemnify said Surgenor as the surety of said Willis for the amount of a Judgment and execution in favor of Bowen & Dickinson, which is estimated to be ~~three~~ two hundred & sixty dollars and twenty four cents, with interest from this date. Now if the said Willis shall on or before the 1st day of January 1872 pay or cause to be paid to the said Abram R. Surgenor the principal & interest due him, and shall also discharge & pay the debt aforesaid, for which the said Surgenor is his Surety aforesaid, then this deed to be void, but if said Conditions are not complied with as above stipulated, then the said Trust shall proceed to execute this trust in the manner & mode prescribed by the 6th Section of Ch 117 of the Code of Virginia of 1860.

Witness, the following signatures and seals.

Witness:

M. B. D. Lane.

Joseph Willis 
mark
William W. Sage 

In County Court Clerk's Office, the 10th day of November 1869. The foregoing Deed of Trust from Joseph Willis to Wm W. Sage, both of Lee County, Virginia, was this day acknowledged before me, in my office, by the said Willis and Sage

to be their act and deed for the purposes
therein mentioned; and, the said deed
being duly stamped, is admitted to record.

Teste - John B. West, D. Clerk

A copy

Teste - J. V. F. Richmond Secy

Joseph Willis
Esq. - Trustee
Wm. L. Sage, Trustee

"Deed"

C 40

Dec 14 7 22

This deed made this 13th day of February 1871 between Walter P. Hamilton and Alexander Hamilton of the first part, and Joseph Willis of the other part, all of the County of Lee and State of Virginia. Witnesseth that the said Walter P. Hamilton and Alexander Hamilton in consideration of the sum of four hundred and fifty dollars to them paid by the said Joseph Willis of the second part doth bargain sell deliver and convey unto the said Joseph Willis all their rights and titles unto and to two certain tracts or parcels of land lying and being in the said County of Lee on the waters of Wallins Creek and on the North side of Powells Mountain supposed to contain one hundred acres of Land lying and being in the County of Lee and State of Virginia and bounded as follows, to wit: Beginning at two Lynns on the top of Powells Mountain. Thence N. 21° W. 52 Poles to a stake between a Sugartree and Lynn marked as pointers on the North Side of said Mountain thence N. 22° W. 80 poles to a Lynn in Taylors line and with the same N. 65° E. 114 poles to a white walnut buckeye and Lynn thence S. 25° E. 132 poles to a stake on the top of said mountain, thence with the top of said Mountain to the beginning to have and to hold the said Tract of Land unto him the said Joseph

Willis and his heirs forever with all the appurtenances to and with said tract of land to the said Joseph Willis and his heirs and doth warrant and defend forever against claim or claims of himself and heirs against the claim or claims of all others (except the Jackson suit that ~~is~~ now is against the land) persons whomsoever in testimony whereof the said Walter P. Hamilton and Alexander Hamilton hath herunto set their hands and affixed their seals the day and year last above written.

Walter ^{his} ~~mark~~ P. Hamilton (Seal)
Alexander ^{his} ~~mark~~ Hamilton (Seal)
Sarah ^{her} ~~mark~~ Hamilton (Seal)

State of Virginia, Lee County to wit:
I, Thomas McPherson a Justice for the County aforesaid in the State of Virginia do certify that Walter P. Hamilton and Alexander Hamilton whose names are assigned to the said writing above or bear by annexed bearing date on the 13th day of February 1871 has acknowledged the same before me in my County aforesaid. given under my hand this the 6th day of February 1873.

Thomas H. McPherson, J.P.

Virginia, Lee County to wit:

I Thomas McPherson and Stokely Lawson Justices of the peace for Lee County do certify that Sarah Hamilton

the wife of Walter Hambleton whose names
are signed to the writing above or hereto
annexed bearing date on the 13 day of
February 1871 personally appeared before us
in the County aforesaid and being exam-
ined by us privily and apart from her
husband and having the writing a-
foresaid fully explained to her she the
said Sarah Hambleton acknowledged the
said writing to be her act and declared
that she had willingly executed the same
and ~~does~~ not wish to retract it given
under our hands this the 9th day of
September 1874

Thomas McPherson J.P.
Stokely Lawson J.P.

Lee County Court Clerks Office Nov. 27th
1874. The foregoing deed between Wal-
ter B. Hambleton & Alexander Hambleton
of the first part and Joseph Willis of
the second part, all of Lee County, Va.
was this day filed in this office and ad-
mitted to record upon the certificates
of Thomas McPherson & Stokely Lawson
two Justices of the peace in and for the
County and State aforesaid.

Teste - John R. Nelson Secy

I Copy

Teste: J. W. Richmond Secy

Joseph Willis
From y Copy recd
Alexander Hamilton

Clerk 80th

Filed with Joseph Willis
Copy

This deed made this 7th day of March
1881, between Joseph Willis and Kiziah
Willis his wife of the County of Lee and
State of Virginia of the first part and A. D.
Maness (Trustee) of the County of Scott and
State aforesaid of the second part, witnesseth
that the said Joseph Willis and Kiziah
Willis his wife do this day convey to the
said A. D. Maness trustee the following
named and described tract of land
lying and being in the County of Lee
and State of Virginia, situated on the
waters of Black water Creek, being two
tracts, one situated on the north side of
Newmans ridge, and the other on the south
side of Stone ridge, The former bounded
as follows, viz: on the north east and
south by Joseph Willis line, and on the
west by Jesse Roberts line, being a por-
tion ^{which} was allotted to Houston Bledsoe,
heir at law of Sampson Bledsoe deceased
Containing fourteen acres more or less.
The latter, bounded as follows, viz:
on the east and south by Joseph Willis
line, and on the west by Emory Gobblers line
being a moiety of an entry made by Jo-
seph Willis and Emory Gobblers, and

Containing twenty five acres more or less, In trust to secure the payment of 3 debts due from Joseph Willis to Lofton Manners. For as much as the said Lofton Manners hath suit ~~for~~ now pending on the equity side of the Circuit Court of Lee County Va, against the real estate of the aforesaid Joseph Willis. And the said Joseph Willis being desirous of securing the payment of the aforesaid debts without further litigation doth grant and convey to the aforesaid trustee the before named and described tracts of land to secure the payment of the same, Nevertheless, should the said Joseph Willis on or before the first day of January 1880, pay or cause to be paid to the said Lofton Manners, or his heirs or assigns the aforesaid debts, No 1 amounting to the sum of \$10.00 with interest from the 4th day of April 1873, till paid, No 2 amounting to the sum of \$50.00 with interest from the 21st day of December 1874, till paid, No 3, amounting to the sum of \$10.00 with interest from the 16th day of April 1875, till paid, and all costs including attorney fee heretofore accrued or which may hereafter accrue by any suits heretofore instituted for collection

of the aforesaid debts, and the costs of
making and recording this deed, it shall
be void, But should the aforesaid Joseph
Willis fail to pay the aforesaid debts in full,
and all interest and costs aforesaid, and
the said cost of making and recording this
deed on or before the said first day of
January 1882, it shall be the duty of the
said trustee to sell the aforesaid tracts
of land by public outcry in front of the
Court house door in Lee County Va, after
he shall have advertised the time and
place of sale, and out of the proceeds
thereof pay to the said Lofton moneys
the aforesaid debts with interest and
all costs aforesaid, and retain five per
cent Commission for services as trustee,
and pay the residue, if any, to the said
Joseph Willis or his personal represen-
tative. Witness the following signatures
and seals. Date above written

Joseph ^{his} Willis Seal
Liziah ^{his} Willis Seal

Signed, sealed and
delivered in the ^{his} presence of ^{his} witness ^{his} Bledsoe
George ^{his} Aglierto

Virginia Lee County - to wit:

I, Thos McPherson a Justice of the Peace in and for Said County of Lee and State of Virginia, do Certify, that Joseph Willis whose name is signed to the writing within bearing date on the 7th day of March 1881, has this day acknowledged the same before me in my County aforesaid. Given under my hand this March the 7th. 1881.

Thos McPherson JP.

State of Virginia, Lee County. to wit:

I, Thos McPherson, and Bookley Lawson Justices of the Peace in and for Said County, do Certify that Kiziah Willis the wife of Joseph Willis, whose names are signed to the writing within bearing date on the 7th day of March 1881, personally appeared before us in the County aforesaid. and being examined by us privily and apart from her husband having the said writing fully explained, she, the said Kiziah Willis acknowledged the said writing to be her act and declared that she had willingly executed the

same and does not wish to retract
it. Given under my hand this March
the 7th 1881.

Thos M. Therson Jr.
Stokely Lawson Jr.

Virginia Lee County Court Clerk's Office
March 29th 1881, The foregoing deed of trust
bearing date on the 7th day of March 1881,
from Joseph Willis and Rixia Willis
his wife of the County of Lee and State
of Virginia, to A. C. D. Mauness Trustee
of Scott County Va was this day ad-
mitted to record upon the Certificates of
Thos M. Therson and Stokely Lawson
Justices of the Peace for Lee County Virginia
Teste John C. Orr D.C.

A Copy-

Teste: J. V. F. Richmond Clerk

A. C. D. Manus Trust
From ~~Campy~~ - sent of
Trust
Joseph Willis wife

D1319-306

Cliv 1/20

~~Filed by Piffs as evidence,
by Content, in case of
N. S. Cox & Co. Williams
Admrs vs Jas. Hilted.~~

S. V. P. (1-9)

This deed made this 24th day of September 1887, by and between Joseph Willis and
Willis his wife of the first part
and John M. Tate Trustee of the second
part witnesseth that whereas the
Said Joseph Willis is indebted to A. L.
Pridemore in the sum of \$431.24 by
note bearing even date with this instru-
ment, being the result of a full settle-
ment this day made between them of
all matters of a personal character
which the Said Willis is desirous
to further secure, Now therefore in
consideration of the premises as well
as the sum of one dollar to the Said
trustee, in hand paid the receipt where-
of is hereby acknowledged, the Said
parties of the first part doth grant, bar-
gain, sell, and convey unto the Said
party of the second part all the lands
owned by them or either of them, situated
in Lee County Virginia. In trust now
the less to secure the payment the sum
aforesaid and interest from this day.
Now if the same shall be paid on or before
the first day of Jan 1889, then this deed
conveyance to be null and void

otherwise the said trustee on application by the said Pridemore shall sell for ready cash so much of said land as will pay said debt and interest and costs of sale. But in the event of sale said trustee shall sell in such parcels and such lands as the said willis may direct, and on his failure to direct said trustee shall sell as he may think best the sale shall be made on some court day at the front door of the Court house, or on the premises of said willis so requests. But no sale shall be made until said land has been advertised for 30 days on said Court house door & in the neighborhood where the land lies - setting out time, terms & place of sale. The said trustee shall have such compensation as is now allowed by law. Witness the following signatures & seals this the day and year first above written

Joseph X willis Read
Attest: John M. Lato

Virginia Lee County to wit:

J. John R. Gibson Clerks of Lee County Court
do certify that Joseph willis is

is signed to the foregoing deed of Trust
bearing date Sept 24th 1887, personally
appeared before me in my County and
acknowledged the same to be his act
and deed and said deed is admitted
to record. Given under my hand this 24
day of Sept 1887.

John A. Latham Clerk.

A Copy-

List: S. V. F. Richmond Clerk

John M. Tate Trustee
From ^{Copy} Recd of Trust
Joseph Willis

1583 22 page 515

Class 60

~~Filed by Consent as evidence
for Plaintiff in Cause of
V. S. Carr v. C. Williams
Admors vs Jas Willis.~~

(S. V. L. R. 8.)

Pliffs
for Tax.

Issued: Andrew Lockhart vs. Almon R. Singer,
Summon Assumpsit, Damage \$800.00.
To Jury Rules.

Morison & Duncan.

The foregoing is a true copy from the Memorandum book of Lee County Circuit Court. And from the date on the opposite page must have been made the latter part of Nov or first of Decr 1874.

A Copy Teste; A. B. Mursey Clerk

Andrew Lockhart.
or { Copy of Memo'
3
Abraham R. Surgenor.

M - 3.
With A. B. Munsey's Depo.

Virginia

At a circuit Court continued and held
for Lee County at the Court house thereof on
Thursday the 6th day of September 1877
Andrew Lockhart Plaintiff

vs
A. R. Surgener Defendant } Inassumpsit

This day came again the parties by their
~~attorneys~~ and thereupon the defendant by his attorney re-
leased \$500.00 of the verdict of ^{the} jury rendered in
this cause on the 3rd day of the present term
whereupon it is considered by the Court that
the motion to set aside said verdict be and
is hereby overruled & that the plaintiff re-
cover against the defendant \$197.00 damages
for the non-performance of the assumptions
in the declaration mentioned, with legal
interest thereon from the first day of Jan-
uary 1872. until paid, and the Costs.

to 21.60
a 2.50
s 9.50
or 29.58

63.18

A Copy

Teste: A B Munsey, Clerk

Andrew Lockhart
vs } Copy of Judgment
A. B. Surgenor

M-1.
With A. B. Munsey's Depts

Clerk 25^{cts}

Q. Book Page 194

Virginia

At a circuit Court continued and held
for Lee County at the Court house thereof, on
Friday the 2nd day of April 1880.

Andrew Lockhart Plaintiff

vs

A. R. Surgener & S. S. Surgener Defendants Bond forfeited

A Motion on
a forth coming

This day came again the plaintiff
by his attorney, and the defendants although
Solemnly Called came not, it is therefore
considered by the Court, that the plaintiff
recover against the defendants \$696.50
the penalty of said bond, but which is to be
discharged by the payment of \$80.33, with
legal interest thereon from the 2nd day of
November 1877. until paid, and the Costs.

A Copy

Teste; A. B. Munsey Clerk

6 3.93
5 1.00
4.93

Andrew Lockhart
vs } Copy of Judgment
A. R. Surgenes et al

M-2-

With A. B. Munsey's Depo.

clerk 25-cts

Q. Book Page 320

Alexander Hamilton for
+C

28. Copy from Ex Book.

~~Am. History - Vol. 10.~~

S. H. A. - 10.

Date of Bi. fa

Style of Suit

Judgt

1871 Jan'y

1877 Mch 6th

Alexander Hamilton,
for Hiram H. Bussier
against

William McPherson and

Jos Hillis

Judgt for \$100.00 with legal interest thereon from
the first day of January 1866, till paid and the
costs. Late C. 5.74 C. 3.48 A 2.50 B 1.00 J 50 wit
1.00 Add for C. 58

Docket of Deans	Return on Fi. Fa.	Rules
Fi. Fa.	Held up by order of the plaintiff. C. L. Hamblin S. L. C. credit the judgment opposite this pledge, by \$25. paid in coin December 1875. H. H. Brashier.	March R/71
Fi. Fa.	No property found. Tho. J. Ely D. S. for Tho. S. Ely S. L. C.	May R. 1877

I hereby certify that the foregoing is a true copy from the Execution
Book No. 6 in my Office. This February 27th 1877.
S. V. F. Richardson Secy

The Commonwealth of Virginia,

To the Sheriff of the County of Lee, Greeting:

We command you, That of the goods and chattles of ..

Joseph Willis

late in your bailiwick, you cause to be made *\$ 57.36*

with interest at the rate of six per centum per annum from the *16* day of *January* 18*92*
until paid, which *Carr Bailey*

late in our Circuit Court of the County of Lee, has ~~recovered against the said~~ *him by suit*
~~as well for a debt as interest thereon~~; also *7.76*

by Bailey ~~about~~ *about* ~~convict~~ *convict* as appears to us of record. And how you shall execute this
writ make know at the rules to be holden in the clerk's office of our said Circuit Court, on the 1st Monday
in *June* next. And have then there this writ.

Witness, *J. A. G. Hyatt*, Clerk of our said court, at the court-house, the *9th* day of
April 1888, and in the 122nd year of the Commonwealth.

Clerk.

6 4.57
3 1.50
2 2.50
Co C 25-
87.76

copy
J. A. G. Hyatt
AB Munsey Clerk

241/ Cir Ct
April 7

(P)
(H)

E. B. No. p.

Carr Bailey

Fl. Fa.

vs.

IN DEBT.

Joseph Willis

(S. V. F. R. - 1)

~~7-4~~

Came to hand:

189, at o'clock M

To. June - Rules -
- 1888

Circuit Court.

~~Just~~ 189

~~O. B. No. p.~~
Not executed, no property
found subject to levy.
May 26th 1888.

G. B. Waller, Deputy
for R. O. Flanery, S. C. L. C.
H. B. Munsey

Virginia--Lee County, To-Wit:

To Fraunce Miles, Constable of said County.

I hereby command you to summon Joseph Willis

If to be found in your District to appear at Jonesville in said county, on the 20 day of April 1894 before me or such other Justice of said County, as may be there to try this warrant, to answer complaint of John B. Wirt

and upon claim for money not exceeding \$100, exclusive of interest, to-wit: For the sum of \$..... due by Kate and then and there return this warrant.

Given under my hand the 10th day of April 1894
J. P. Leary J. P.

..... } On the day of 189 .
..... } (In Debt)
..... } At In said County,

JUDGMENT, That the Plaintiff recover of the Defendant \$9.56 with interest thereon from the 13 day of May 1893 until paid, and \$... 90 for costs. Given under my hand this 19th day of May 1897.
Doddley R. Dawson J. P.

VIRGINIA--Lee County, To-wit: To Fraunce Miles Constable of said County.

I command you in the name of the Commonwealth of Virginia, that of the goods and chattles of

Joseph Willis

....., in your county, you cause to be made the sum of \$ 9.56 with interest thereon from the 13th day of May 1893, till paid, which

John B. Wirt has recovered before me warrant in debt, and also the sum of \$ 90 which were adjudged to he said John B. Wirt for costs in prosecuting said warrant.

Given under my hand the 19th day of May 1894
D. Dawson J. P.

*A Copy
Lester, S. F. Richmond Clerk*

John B. Wirt
Jsg Warrant
Jos Willis

Executed May
19, 1874

Frause Miles
Court

No property found
J. Miles Court

4 Copy -

Filed: J. W. Richmond
Clerk

Clerk 25

(S. V. L. R. - 4)

Virginia---Lee County, To-Wit:

To *Wm. Bouhau*, Constable of said County.

I hereby command you to summon, *Joseph Willis*

If to be found in your District to appear at the office of *John M. Sate* J.P. in said county, on the *4th* day of *March* 18*82* before me or such other Justice of said County,

as may be there to try this warrant, to answer complaint of *Wm. C. Hugate* *Adm'r*

and upon claim for money not exceeding \$100, exclusive of interest, to-wit: For the sum of \$*5.00* due by *Note* and then and there return this warrant.

Given under my hand the *28* day of *Feb* 18*82*

Wm. C. Hugate *Adm'r* } On the *30* day of *June* 18*82*.
Joseph Willis } At *John M. Sate* J. P. in said County, (In Debt)

JUDGMENT, That the Plaintiff recover of the Defendant \$*5.00* with interest thereon from the *20th* day of *Feb* 18*80* until paid, and \$*80* for costs.

John M. Sate J. P.
VIRGINIA—Lee County, To-wit: To *Wm. Bouhau* Constable of said County.

I command you in the name of the Commonwealth of Virginia, that of the goods and chattles of

Joseph Willis, in your county, you cause to be made the sum of \$*5.00*

with interest thereon from the *20* day of *Feb* 18*80* till paid, which

Wm. C. Hugate *Adm'r* has recovered before *me*

warrant in debt, and also the sum of \$*80* which were adjudged to

he said *Wm. C. Hugate* *Adm'r* for costs in prosecuting said warrant.

Given under my hand the *20th* day of *June* 18*82*

Copy-
Filed: 17th Richmond Lee Co.
John M. Sate J. P.

Com Co. Fugate Summ
vs J. Warrant
Joseph Willis

Executed Feb 28th 82

H. C. Bonhau ⁶²⁶

(S. V. R. - 2)
Execution

vs
Joseph Willis

Issued to H. C. Bon-
hau June 20th 1882.

J. M. Tate JP.

No property found
this August 20th 1882

H. C. Bonhau ⁶²⁶

Dec 18 25
Filed Aug 23rd 1882
J. R. Gibbons

1 Copy

Teste: W. F. Richmond Clerk

Virginia---Lee County, To-wit:

To W. B. Bonham, Constable of said County.

I hereby command you to summon... Joseph Willis

If to be found in your District to appear at the office of John M. Tate in said county, on the 4th day of March 1882 before me or such other Justice of said County, as may be there to try this warrant, to answer complaint of Wm C. Sugate Adm

and upon claim for money not exceeding \$100, exclusive of interest, to-wit: For the sum of \$5.00 due by Notes and then and there return this warrant.

Given under my hand the 28th day of Feb 1882

Wm C. Sugate Adm On the 30 day of June 1882
Against Joseph Willis At John M. Tate in said County,
J. P.
JUDGMENT. That the Plaintiff recover of the Defendant \$5.00 with interest thereon from the 13th day of Aug 1882 until paid, and \$.80 for costs.

John M. Tate J. P.
VIRGINIA—Lee County, To-wit: To W. B. Bonham Constable of said County.

I command you in the name of the Commonwealth of Virginia, that of the goods and chattles of

Joseph Willis, in your county, you cause to be made the sum of \$5.00

with interest thereon from the 13th day of Aug 1882 till paid, which

Wm C. Sugate Adm has recovered before me warrant in debt, and also the sum of \$.80 which were adjudged to

he said Wm C. Sugate for costs in prosecuting said warrant.

Given under my hand the 20th day of June 1882

John M. Tate J. P.

Copy
Filed: 197 Richard

Com C. Ingate Sumr
2.5f warrant
Joseph Willis

Executed Feb 28-82
H.C. Bonham
C.L.C.
(89.12.1-3)

Execution

vs 3.

Joseph Willis.

Issue to H.C. Bonham
Court June 20th 1882

Jno M. Tate J.D.

No property found this
August 20th 1882

H.C. Bonham C.L.C.

Clerk vs
Filed Aug 23rd 1882

J.D. Deane H.C.
ccompy
Teste: J.D. Richmond Clerk

Virginia---Lee County, To-Wit:

To A. H. Bolin Constable of said County.

I hereby command you to summon, A. R. Surgeon & Joseph Willis

If to be found in your District to appear at June 1886 in said county, on the June day of 1886 before me or such other Justice of said County as may be there to try this warrant, to answer complaint of M. D. Richmond

and upon claim for money not exceeding \$100, exclusive of interest, to-wit: For the sum of \$ 90.00 due by note, and then and there return this warrant.

Given under my hand the 22nd day of June 1886

J. H. Frost J. P.

M. D. Richmond Receiver On the 7 day of August 1886
Against Jos. Willis and A. R. Surgeon (In Debt)
At my office in said County,
JUDGMENT, That the Plaintiff recover of the Defendant \$ 90. with interest thereon from the 1st day of April 1886 until paid, and \$ 1.50 for costs.

Jos. Willis Survivor
J. P.
VIRGINIA—Lee County, To-wit: To A. H. Bolin Constable of said County.

I command you in the name of the Commonwealth of Virginia, that of the goods and chattles of Joseph Willis Survivor &c

in your county, you cause to be made the sum of \$ 90.00 subject to a credit of \$ 100.00 June 19 1886. also 50¢ Jan 24 1884 with interest thereon from the 1st day of April 1886 till paid, which

M. D. Richmond Receiver has recovered before me

warrant in debt, and also the sum of \$ 1.50 which were adjudged to

the said M. D. Richmond Receiver for costs in prosecuting said warrant.

Given under my hand the 7th day of August 1886

Jos. Willis Survivor J. P.

1 copy
Lest: S. D. & Richmond Clerks

Subject to a credit of two dollars June 19 1883
also by \$50. June 24 1884

M. D. Richmond
Warrant
of Joseph Willis &
A. R. Surgeon.

Executed June 22/1886.
J. H. Bolin C. C. C.
Filed 1st Saturday
in July 1886 before
J. M. Tate J. P.

Continued until 1st
Sat in August - 86.
at the instance of
deft Willis
July 3rd 1886
J. M. Tate J. P.

Filed & docketed
Oct 7th 1886.
John R. Gibson
Clerk

Clerk 25
(S. V. R. - 1)

(over)

No property found
Sept 23 1886

J. H. Bolin
A Copy -
Teste: J. H. Richmond C.
Clerk

The Commonwealth of Virginia,

To the Sheriff of the County of Lee, Greeting:

We command you, That of the goods and chattles of

Joseph Willis

in your bailiwick, you cause to be made

\$68.08 1/2

with interest at the rate of six per centum per annum from the

19th day of Sept 1876

until paid, which

A. D. Zion, M. D. Richmond & S. T. Bishop

late in our Circuit Court of the County of Lee, have recovered against ~~the said~~

him by decree

~~as well for a debt as interest thereon;~~ also

\$12.73

dollars and

~~cents,~~ which to the said

our said

in the ~~same~~ court were adjudged for *their* costs

by ~~about~~

~~suit~~ in that behalf expended, whereof the said

Willis is

convicted as appears to us of record. And how you shall execute this

writ make know at the rules to be holden in the clerk's office of our said Circuit Court, on the 1st Monday

in *July* next. And have then there this writ.

Witness, *James W. Orr*

~~A. D. Munsey~~, Clerk of our said court, at the court-house, this

5th

day of

May

1879, and in the 125th year of the Commonwealth.

James W. Orr. Clerk.

*Cash 12.05-
6 .68
\$12.73*

*A Copy.
Lites -*

A. B. Munsey

eng' 75- (L)

E. B. No p.....

A. D. Gian Stals.

FI. FA.

vs. }

IN DEBT.

Joseph Willis

S. V. H. R. - ()

p-4-

Came to hand

189 , at . o'clock . H

~~7th~~ July Rules
1879.

(Grand Court.

~~and~~ 189

~~O. B. No.~~ p.....
No property found
Grace Miles, D. S.
for J. S. Ely. D. L. C.
At copy.
Lester - A. B. Murray Clerk

THE COMMONWEALTH OF VIRGINIA.

TO THE SHERIFF OF LEE COUNTY GREETING:

We Command You that of the Goods and Chattles of

Joseph Willis

Late in your Baliwick you cause to be made \$ *47.62* the penalty of a Forthcoming Bond, to be discharged by the payment of \$ *23.36* with legal interest thereon from the *19th* day of *January* 18 *74* till payment which *S. B. Herron for Wm Roberts*

Lately in our Circuit Court of Lee County *do* *him* by motion on said Bond;

also \$ *2.27*

which to the said *Herron for &c*

in our Court were adjudged for

Willis is

his

costs in that behalf expended whereof the said

Convicted, as appears to us of record. And that you have the same before the Judge of our said Court at the

Courthouse on the first monday in

June

next to render to the said

Roberts

of the

James W. Orr

and costs as aforesaid.

And have then there this writ- Witness, *JOHN A. C. HYATT* Clerk of our said court at the courthouse this

8th day of *April*

188*5* in the *29th* year of the Commonwealth.

61.77
31.50
\$2.27

Lee

Wm Roberts

James W. Orr Clerk.

Wm Roberts

60/ (8) 1870

S. B. Herran for ve.

to } Hi Ha.

Joseph Willis
to security to be taken

June 12th 1875-

Wed April 22d '84-
H. A. M. B.

that executed no
wishes by found. duly-
sent to Henry June 7/1875:

H. A. M. Baker
D. B. for L. H. M. M.

A copy

Teste A. B. Munsey
Clerk

(S. V. H. R. - 5)

			Judgment	Liens & Docket.	
Judgment Liens Docket	By what Court Tendered	Time of Docketing	Names and description of parties	Debit, Damages, Interest and Costs.	Amount and Date of Credits.
1896 Aug 20	Lee Co Court	1896 Oct 10 th	Windsor Bledsoe Reff vs Joseph Willis	Debit } Judgment for \$19.25 with inter- est from 11th day of October 1882, until paid & costs \$1.25 C 3.45 JP 1.00 \$50	
			A Copy - Teste: D. W. Richmond Clerk		

Windron Bledsoe

2-8 } Copy of Judge's Letter

Joseph Willis

"Bledsoe"

Copy
Caricature

Eastern District of Virginia.

W. Blankenship,
UNITED STATES COMMISSIONER.

JONESVILLE, VIRGINIA.

DEPT. OF JUSTICE - Any person using
this stamp to avoid the payment of tax
in any kind will be subject to the
penalty of law.

Williams

vs

Joseph Willis.

Papers filed with
S. V. H. Richmond

Depo - Feb 27th 1897

H. C. Fosberg, P.R.

William Mcphearson late Deputy Sheriff of
James W Orr late high Sheriff of Lee County Va.
and Andrew Lockhart, J. M. Parsons, Stokely
Lawson & Joseph Willis securities of the said
Mcphearson Deputy Sheriff as aforesaid in
his bond to save harmless, the said Orr-
Sheriff as aforesaid, and Conditioned to the
performance of the duties of the said Mc-
phearson Deputy Sheriff as aforesaid.

Gentlemen.

Take notice that on the
2nd day of the November term 1867, of the
County Court of Lee County, at the Court house
thereof I shall move the said Court for a
Judgment against you and each of you
for the amount of five separate receipts
given by the said Mcphearson to me the
said Orr for tax tickets for the years 1866,
1867 & 1868, and also for certain Clerk's fee
bills, License taxes, and Sheriffs fee bills as
shown by the said receipts for the years
above mentioned, which were placed in
the hands of you the said Mcphearson, Deputy
Sheriff as aforesaid for collection and which you
the said Mcphearson have collected and failed
to pay over as was your duty to do, and which
I as Sheriff have paid, and am liable to pay to
the amount of eight hundred dollars, by reason
of your failure as aforesaid. I shall also

the Court at the same time for the costs of this motion.

October 28th 1869.

James W Orr.

Executed on James M Parsons, and William McPherson by delivering his wife a copy of the within and Joseph Willis and Stokely Lumsden November the 5 1869 and Andrew Lockheart.

Wm W Dyer. S. L. C.

He accept legal service of the within notice November 1st 1869.

J. M. Parsons.

1869. Nov. - Notice Proued & Continued.

- Nov. Jud for Plff for \$843.93.

The foregoing is a true copy of the Notice of James W Orr against Wm McPherson et al's and the judgments thereon, in which judgment was rendered in Lee County Court at the Nov term 1869.

Teste: J. V. F. Richmond Clerk

Received October the 1866, of James W Orr S. L. C. Lux tickets for the year 1866, amounting in the aggregate to the sum of (\$756.05) nine hundred and fifty six dollars and five cents which I bind myself to collect and account for to the said Orr or return according to law.

Wm McPherson Deputy
for James W Orr. S. L. C.

1866.	Amount of Lax tickets received by Wm			
Oct.	McPhearson this sum			\$ 956.05
	By delinquent Lax tickets returned this sum	\$ 101.79		
	" Commission on \$ 854.26 remainder	48.00		
	" Cash, Jury claims & receipts for Co claims	591.10		
1867.				
July 12	" Cash	20.00		
Aug Rules	" Cash	11.50		
		772.39	956.05	
1869.	Balance due March 15th 1867.		183.66	
June 15th	Credit, \$10.00 by Andrew Lockhart	10.00		
Oct 1st	" 50.00 " Same	50.00		
" "	" 7.00 " Wm McPhearson	7.00		
" "	" 20.00 " Andrew Lockhart.	20.00		

The foregoing is a copy of one of the receipts filed with said Notice, together with the statement & credits at the foot thereof.

List: J. V. F. Richardson & Co.

James W Orr
vs } Copy of Notice re.
- Am McPherson et al.

Q 1 + 2
Not Jas W Orr's Depts.

Received of Andrew Lockheart this by one
Dollar and four teen cents the full amount
of my claim and being the full amount
of my claim I hereby certify that I have received
the same from Andrew Lockheart.

Witness my hand and seal this 7th of June
1872

William J. W. Sages Test D. & C.

6th Mass
 Receipt
 by Gate
 3/1/44

O-3.

Wm L. Austin Treasurer
(\$1650) Sixteen dollars and
fifty cents for the benefit
of David M. Austin and credited
to me in order I recd from
said money on Wm Baker.
This July 2nd 1855.
G. S. H. [unclear]

O-4.

Received of Andrew Lackhart Seventy
Dollars paid money this 5th day of
May 1870. A. R. Surfer

O-S-

The Commonwealth of Virginia,

TO THE SHERIFF OF LEE COUNTY—GREENSBORO

WE COMMAND YOU, that of the goods and chattels of *M^r M^r Pearson, St Kely Lawren, James*

M. Parsons, Joseph Willard,
and Andrew Lockhart,

late in your bailiwick, you cause to be made & 84 3. 93

with legal interest thereon from the 15th day of March, 1867, till paid and

which the like interest on \$349.60 from the 15th day of March 1868, and the like interest on \$282.52, the residue, from the 15th day of March 1869, ^{the paid} which James M. Orr

lately in our County Court for Lee county, has recovered against
also, \$ 6.73 which to the said *or* *them* ^{notion} ~~has~~ for money collected

in our said Court were adjudged for costs in that behalf expended whereof the said *M. & P.*

Lawson, Parsons, Wilis & Lockhart are convicted as appears to us of record. And that you have

the same before the Justices of our said county Court, at the Court House, on the first Monday in

Feb 21 1862 not, to render to the said V. 1

of the *debt, interest* ————— and costs aforesaid.

And have th^{at} there this writ. Witness, JOHN B. WEST, Deputy for SYLVESTER F.

THOMPSON, Clerk of said Court, at the Court House, this, four day of December

1869, in the 94th year of the Commonwealth,

61.73

A 2.50

S. 2. 50

 $\cancel{8} 6.7^3$

John B. West, D. Clerk

40 6 1

James M. May

3 Feb 1870

11 1/2 in. x 1 1/2 in. x 1 1/2 in.
February 1870

Not Entered
Who's Who

(06)

Line 15 The History
of the 1870

ORR & BLANKENSHIP,
Attorneys and Counselors at Law,
JONESVILLE, VIRGINIA.

A. Lockhart
vs Receipts &c
Geo Willis

With Geo W Orrs Depts

0-3, 0-4 Δ 0-5-
0-6

One day after date I promise
to pay H. L. Pridemore the sum of four
hundred & thirty one dollars & twenty
four cents and as to this debt waive
the benefit of my homestead exemptions.
Witness my hand & seal this Sept. 24th
1887

A copy

Attest -

Jos M. Tate

~~Copy~~ (signed) Joseph ^{his} ~~mark~~ Willis Seal

Oct. 10th 1894

credit by check if paid when presented. this sum \$100 =

credit Dec 1 1894 By check this sum 200 =

credit Dec 17th 1894 by cash 100 =

Cr the 100th note one hundred dollars Feb 1895 100.00

Cr the within note eighty dollars 2 more
this Oct 21 1895

Cr by twenty dollars this month 1896.

Willis

St. L. Prichard
No 3 note 431-24

Joseph Willis

for value received bearing the within
note E. B. F. Thirsk the amount being
on the 16th 1894 is the sum of (\$601⁰⁰)
By check of bank on Wilson Land-Office
16th 1894 (Paid) (St. L. Prichard)

William McPherson late Deputy Sheriff of James Co.
late high Sheriff of Lee County Va. and his associates
J. H. Parsons, Stokely Lamson, & Joseph Willis, securities of the
said McPherson Deputy Sheriff as aforesaid in his bond, to said
namelss. the said Cor. Shff as aforesaid, and conviction of
to the performance of the duties of the said McPherson Deputy
S.

and notice that on the 2nd day
of the November term 1869, of the County Court of Lee County, Va.
shall move the said Court for a judgment against said
for the amount of five several months pay
of the said McPherson to me the said Cor. for his fees for
the years 1866, 1867, & 1868, and also for certain other
License Taxes, and Sheriff's fees as shown by the said
in the years above mentioned, which were placed in the hands
of the said McPherson Deputy Shff as aforesaid for collection
and which ^{the said McPherson} you have collected and failed to pay over as was
your duty to do, and which I as Shff have paid by ^{and am liable}
to pay to the amount of Eight hundred dollars
of your failure as aforesaid. I will also move the Court at
the same time for the costs of this motion.

Nov 28th 1869,

James H. Orr,

Received October 12th 1867. of James Worr. S.L.C. Tax tickets
for the year 1867. amounting in the aggregate to the sum of
(\$352.52) Three hundred and fifty two dollars and fifty two cents
which I bind myself to collect and account for to the said Orr
or return according to Law.

Wm. C. McPherson

Deputy

for James Worr. S.L.C.

1867									
Oct	To Amount of Tax tickets delivered to Wm. McPherson this sum							\$352	52
	By 3 $\frac{1}{4}$ per cent Commission on same.			"	"	13	21		
1868	" Jury claims			"	"	58	25		
June	" Cash at Cooke store			"	"	1	88		
Mar 15 th	" Balance paid on Stohely Lausano Co claim			"	"	9	58		
						82	92	352	52
	Balance due March 15 th 1868.							269	60

269.60
80
349.60

William McPherson

To } Receipt for 4 tickets

James Kerr for 1867

Received before the 1866 of James W Orr. S.L.C. Tax tickets
for the year 1866. amounting in the aggregate to the sum of
(\$956.05) nine hundred and fifty six dollars and five cents.
which I bind myself to collect and account for to the said Orr.
or return according to Law.

Wm McPherson

Deputy

For James W Orr. S.L.C.

1866	Amount of Tax tickets received by Wm McPherson this Sum	\$ 956	05
By delinquent Tax tickets returned this Sum	\$ 101	79	
" Commission on \$854.26 remainder "	"	48	00
" Cash, jury claims & repts for Co claims "	"	591	10
July 1st " Cash. "	"	20	00
Aug 1st " Cash	"	11	50
		772	39
1867	Balance due March 15th 1867 "		183 66
June 15th	Credit \$1000 by Andrew Lockhart	10	00
Oct 1st	" 50.00 " Same	50	00
" "	" 7.00 " Wm McPherson	7	00
" "	" 2.00 " "	2	00
		183.00	183 66
		28 15	80
		211.81	28 15
		349.60	269 60
		28 52	282 52
		843 90	843 93

William McPheerson

To } Receipt for Car tickets

James W. Orr for the year 1866

List of Clerks Tickets delivered to Mrs McKeenoon for Collection

Thomas Anderson	\$3 98	Amount Brought forward	68 04
Arion R Anderson	\$1 28	Arthur Rogers	\$ 4 50
A R Anderson Adm ^r	\$2 00	Andrew Roberts & G W Osbourne	\$ 6 33
Thos S Burk	\$2 40	Andrew Roberts	\$ 1 55
Arch Burk	25	Martha E Pittiff	\$ 2 00
Narrissa Bledsoe	\$2 25	George Rogers Est	\$ 1 90
James Collins	\$3 08	James Patel	\$ 1 45
Ezra Countis	\$2 00	A D Surginer	\$ 4 44
Mrs J M A Deane	58	A R Surginer	\$ 1 28
S H Duff	\$ 60	Jeff Chandler	\$ 4 96
S H Duff Adm ^r	\$2 00	Wm W Sage	\$ 4 35
H S Duff	\$ 6 44	J W Eward	\$ 2 65
Samuel H Duff	\$ 1 00	Andrew J Diller	\$ 8 05
E J Deaule	\$ 3 40	Isaac H Robinson	\$ 3 58
J L Hamner	\$1 08	Osbourne Stanley	\$ 1 35
G A M Ferguson	\$2 65	W C Rutherford	\$ 3 51
J W M Ferguson	\$2 26	Jas M Kyle	\$ 3 56
L H Gobble	\$2 00	Thos Lawson	\$ 3 83
A L Hickman	\$ 1 53	Mrsula Wilson & Sarah Allen	\$ 2 08
Thos J Larmer	\$ 25	James M Venable	\$ 3 42
Thos J Larmer Sr	\$1 34	James W Sage	\$ 1 00
Melaney J Lawson	\$ 3 83	Elisha Standifer	\$ 1 34
Russell J Lawson	\$ 25	J R Burk	\$ 2 25
Wm W Lenacy	\$ 1 85	John Wynns Adm ^r	\$ 2 35
James A Larmer	\$ 2 00	Andrew Lenacy	\$ 3 25
S S Maineb	\$ 3 92	Wilena L Young	\$ 4 00
Robert Moore	\$ 2 50	E Young	\$ 1 00
George Osbourne	\$ 2 25	Calvin Young	\$ 2 80
John & Jesse Osbourne	\$2 25	Pendleton & Young	\$ 1 53
Janie H Preston	\$2 00	B Young & Son	\$ 3 98
Mary Roberts	\$ 90	A Lenacy	\$ 2 25
Jacob Rasmick	\$ 1 93	J W Sage	\$ 1 25
\$68.04		\$68 85	

Amount brought forward \$ 163 85-

Daniel Hawthorn \$ 1 43

S D Haneff \$ 2 65-

John W Seward Committee \$ 1 36

John A Moor \$ 1 35-

Martin Sims \$ 2 45-

Jno S Sims \$ 2 45-

Jno S Sims \$ 2 25-

A J - Livingston \$ 4 90

Joseph Willis \$ 9 45-

By Acc bills returned \$ 184 36

\$ 103 14

\$ 84 22

Am't collected by Mr McPherson \$ 84, 22

By 5 percent com for collecting 4, 22

Balance due Nov 15th 1868, \$ 88.00

Received of James W Orr, S L Co. Clerks Tickets Corresponding with
the foregoing List, ^{amounting in the aggregate to the sum of \$ 184.36} which I am to collect and account for on
return according to Lane, August - 15th 1864.

Wm McPherson S. S.

List of Clerks Tickets

Delivered to Wm McPherson
— Jan, 28

Received of James Worr S.L.C. a List of License Taxes amounting to (\$19.00) Nineteen dollars. which I bind myself to collect and account for or return according to Law. Also fee bills of the said James Worr amounting to (\$10.50) Ten dollars and fifty cents. which I also bind myself to collect and account for or return as the Law directs. October 1866.

Wm. C. McPherson, Deputy
For James Worr S.L.C.

1866
Oct.

The amount of License Taxes delivered to Wm. McPherson this sum.	\$	19	00
By 3 per cent Commission on Same		57	
To Amt of Fee bills delivered to Wm. McPherson			10 50
By 1/2 per cent Commission on Same		78	
Balance due March 15th 1867.	\$	35	29 50
			28 15

William. M. Peterson

To { Receipt for License Tax^{rs}

James W. Orr. in the year 1866

United of James H. Co. Sheriff See List, in following
 a List for collection of -

Anderson, John's estate	10	59	Fannin, William	3	23				
Anderson, Aaron R.	4	41	Greer, James Henry	3	42				
Anderson, John	2	70	Gulliver, Hugh	2	95				
Anderson - Martin's estate	18		Gibson, Shephard		64				
Bledsoe, John	2	10	Gobbie, Dickinson	4	52				
Bledsoe, Harrison	1	14	Gocus, Isaac	4	36				
Bledsoe, Jonathan	2	61	Gobbie, Mary A.	2	83				
Bryant, William	3	44	Gocus, John	4	76				
Bledsoe, Austin	2	47	Hill, Charles, Jr.	3	60				
Bledsoe, Isaac	2	67	Herd, John		23				
Babb, Philip	5	17	H. L. Jones	2	71				
Belcher, Orrin	2	47	Jones, William	2	16				
Belcher, Elizabeth 40.88	13		Joinder Lewis A.	36.20	2.79				
Boos, Oliver	3	84	Joinder, Miles A.		2.67				
Bledsoe Elias' estate	36		Johnson Ira		2.58				
Bledsoe Joseph	1	08	Johnson, Nelson		2.71				
Bledsoe, Samuel's estate	85		Johnson, Alfred		2.72				
Belcher, Simon	86		Johnson, James		2.57				
Chandler, Lucinda	42		Johnson, Granville		2.53				
Chandler, Jefferson's estate	72		Johnson, John A.		5.65				
Chandler, Allen	3	53	Johnson, Leonard		2.78				
Cheney, William	2	85	Johnson, William		2.76				
Dickinson & Grantham	84		Johnson, Abraham		2.77				
Drummond, James	35		Johnson, James		2.90				
Edgins, Preston	3	19	Johnson, Joseph		3.31				
Eastridge, George W.	3	07	Jackson, John		4.79				
Fisher, John	2	57	Jackson, John		5.46				
Fannin, Martin	2	13	Langley, George		3.24				
Fisher, John	4	03	Langley, James C.		1.75				
Fisher, James	2	60	Lawson, Robert		2.58				
Fisher, John	2	61	Lawson, Andrew		1.55				
		77.25			50.22				

NAME	AGE	DATE	AMOUNT
Q. uacy, Emily	3	11	08
Quincy, William	3	26	15
Lawson James	2	69	03
Levacy, William H.	2	90	73
Lawson, Hudson	3	11	29
Lawson, Russell	2	40	32
Lawson, Marion	5	59	57
Levinson, John	3	54	72
Levinson, Reuben H.	3	33	58
Lawson, Stokely	3	18	58
Lawson Amos	3	02	48
Levacy, Sanders H.	3	21	54
Maness, Francis	3	72	89
McPhee, Thomas	4	15	61
Moore, Robert	2	96	17
Martin, Benjamin	2	69	57
Martin, Sterling	6	04	75
Martin, John	4	15	42
Maness, Howard	2	95	54
Mahone, Sampson	3	23	57
Moore, Hymnlight	2	47	55
Mansin, William	1	87	34
Mann, Andrew	1	01	60
Mann, Henry	17	09	40
Mann, John	12	06	00
Meit, Abraham R.	35	05	30
Newberry, Daniel	4	99	33
Nichols, Josiah	40	00	36
Oxley, Ruth	31	00	60
Osborn, James	2	96	47
Osborn, John H.	2	70	36
Osborn, George H.	3	13	71
Osborn, George	4	61	54
TOTAL			120 43

Robinson, James	8 10
Robinson, James & James Osborn	2 57
Roberts, Susan	22
Sargnier, Stephen	12
Sargnier, Stephen	5 53
Sargnier & A. R. Anderson	26
Stapleton, John A.	2 47
Stapleton, John M.	3 77
Stapleton, Lewis	3 54
Testament, William's Estate	2 16
Wallen, George's Estate	2 80
White, James' Heirs	11 56
Willis, Joseph	9 07
Wallen, Elizabeth	41
Wallen, Green	3 00
Wallen, Greenberry	2 34
Willis, James	10
Willis, William	1 52
Willis, David	72
Howe, William (for 1868)	4

Wm. McPherson \$128.00

Am't of tickets to Mt. Vernon	\$ 450 06
By delinquents returned	23.54
" 3 $\frac{3}{4}$ per cent Com on \$426.52	16.00
" All credits	128.00
	<hr/> 167.54
Balance due March 15 th 1869.	282.52

William McKeasone

To { Receipt for Tax tickets

James W Orr for the year 1868

Virginia,

In the Circuit Court of Lee County.

Cox and Williams, Administrators, Plaintiffs.

Against (In Chancery.

Plffs' Brief.

Joseph Willis, et al., Defendants.

-----Bill for Subrogation and to Enforce Judgement lien against Co-
security.

-----The judgement and J. W. Orr's deposition proves the relation of the parties to each other in the judgement, which allegation is not denied by defendant Willis' answer.

-----J. W. Orr's deposition and the receipt and return of W. A. Baker, Deputy Sheriff, show that Lockhart, Plaintiffs' decedent paid the judgement, except the three credits of \$16.00 March 15th 1869; \$10.00 June 15th 1869, and \$77.00 October 1st ~~1869~~ 1869, which it is proved and admitted were paid by the principal, William McPherson. The ~~xxxx~~ residue was paid by Lockhart. It is also proved that Lawson on a compromise paid Lockhart his one-third of said judgement, and that the defendant Willis paid nothing. Mr. Willis does not claim in his deposition or in his answer that he ever paid anything on said judgement. Then Lockhart's administrators are entitled to subrogation as to defendant Willis', due proportion of said judgement, which is shown by the evidence to be one-third of said judgement, after applying the three first credits endorsed on the fi fa exhibited with J. W. Orr's deposition amounting to \$103.00. The doctrine of the right of subrogation is well settled, and as we understand it, the party entitled to the right is to be placed in the shoes of the party to whose right he is substituted. Judge Carr said: " It ~~xxx~~ is the creature of equity and real essential justice in its object."

-----The Statute provides that the right to enforce a judgement lien shall be governed by the statute providing for the issuing of executions, which period we understand in this case to be twenty years. And our Court of Appeals, See Virginia Law Register, Vol. 2., #2, Page 112, in James' Executors, etals against Life, says: " The right to file

can be no laches in such cases, that will defeat the collection of a just debt unpaid. See the Va. Law Register, May Number 1897, Page 54, Vol. 2., # 2., Page 112.

-----The insolvency of McPherson and Parsons is not denied. The Defendant in his answer alleges that McPherson turned over to Lockhart collaterals, but ~~there is~~ no evidence in support of this allegation is offered. If it had been true it would have been proved.

-----The defendant's labored effort to show that he had real and personal property, if it could avail him anything, is a failure. The ~~xxx~~ record evidence is strongly against him. There are too many deeds of trust, and executions returned no property found--but if he had property why did he not pay? He gives no reasonable excuse for not paying. He says he was not called on by the officer, but that is too transparent--then his deposition is excepted to, as incompetent, which exception is insisted upon, but we want to call attention to the fact that he does not mention the collaterals..

-----The Plaintiffs were not parties to the suit of Joseph Willis against James W. Orr, adm'r, etc., in which the Sergener deed of trust was declared void, and it is proved that there is nothing on the record showing the satisfaction or annulment of the said deed of trust; nor is there any evidence by defendant, or otherwise, that the Plaintiffs ~~had~~ ^{had} actual notice of said decree. No laches can be charged to them in regard to this matter, then they as fiduciaries are not to be held to the same strictness that their decedent might have been, should he have lived until the institution of this suit. We earnestly submit and insist that the Plaintiffs are entitled to a decree for one third of the amount of the said judgement, as of August 26th ~~xx~~ 1875, the time that Lockhart paid it off, being for the sum of \$386.83 with interest thereon from August 26th 1875, 'till paid. (Said three first payments ^{being credited} made by McPherson leaves as we calculate it, the said balance of \$386.83, as the amount of Lockhart's payments on said judgement, with interest ^{for Willis} calculated to the said 26th day of August 1875 ^{for Willis}.)

Very Respectfully.

Wm. B. Blankinship & Atty
(Wm. A. Orr & S.)

May 13th 1897 (Over)

Since writing the foregoing Brief, There has been some additional evidence taken in regard to the collaterals alledged to have been turned over by McPherson to Lockhart. We think the evidence shows that the few tax tickets and perhaps a small debt on Lambert wine fully accounted for by Lockhart in the payments made by him and credited in the judgment for the benefit of all the defendants. In G. W. Orr's Depositions & exhibits therewith.

As to the Surgeon's Order the evidence fails to show that any such order was ever collected and leaves it doubtful as to whether or not any such order was ever given. And exhibit O5 with J. W. Orr's last deposition shows that Andrew Lockhart paid to A. R. Surgeon \$70⁰⁰ dollars borrowed money May 5th, 1870. Why would he have done this if Surgeon owed him an order of \$300⁰⁰ that had been accepted?

G. W. Blankenship } Atty
Wm A. Orr Sr }

Looy and Williams, Admin

vs

Joseph Willis et al

In Chy

Plaintiff's Brief

5/12/77

Letter to William

\$ 25.00 Recd. of Andrew L. Smith money for
he is credited on an account against his share
put in favor of John C. ^{and} on my account for the same.
June - 21, 1870, Wm. B. Smith
Att. for C. & S.

W. H. in. H. H.

Receipt
1 5.50

Anders L. L. L.

Receipt

Filed Oct 5th
1896.

H. C. L. L. L.

The Commonwealth of Virginia,

To the Sheriff of Lee County---Greeting:

WE COMMAND YOU, that of the goods and chattels of

James W. Orr

late of your bailiwick, you cause to be made \$ 843. 93 with legal
interest thereon, from the 1st day of *Jan* 1867, till paid, which
\$211.81
1867 *1868* *1869* till paid, which James W. Orr

lately in our County Court for Lee County, has recovered against *James W. Orr* by *James W. Orr* for
also \$ 7.63 Which to the said *James W. Orr* not paid over

in our said Court, and for costs in that behalf expended, of the said
convicted,
as appears to us of record. And that you have the same before the Judge of our said Court, at the
Courthouse, on the first Monday in *February* next, to render to the said

of the *felony* and costs aforesaid.

And have then there this writ. Witness, JAMES W. ORR, Clerk of our said Court, at the
1867 in the year of the

Received of Mrs. H. Mc. Cooper J. S. \$41.50
which was paid to Charles J. Harris, it
being the amount in full of said
Execution. This David Miller.
Aug: 26th 1895-

Execution
Filed Oct 5th 1876.
H. C. Loslyn A.P.

[illegible]

copy of William Adams

vs { manuscript from
and book

Joseph Willis et al

"Richmond."

Filed with deposition
of S. V. F. Richmond Clerk
Oct. 9th 1896.
H. C. Foslyn J. P.

clerk's fee .25

Table of Tracts of Land for the year 1869
In Lee County within the District of Nathaniel S. Bailey Commissioner of the Revenue.

Name of Person who by himself or by his tenant has the free hold in the possession of the land charged.	Residence of the owner of the tract of land.	Nature of the owner's estate whether held in fee or for life.	Number of acres in each tract.	Name of the tract of the land, mountains, or river which	and description water courses or places on or in	Distance and bearing from the court house per acre, including buildings. Bearing from miles
Willis Joseph	Lee	In fee	6 2	Black	water	SE 9 miles
Same	"	" "	3 2 5	South Side	and ridge	" " "
Same	"	" "	not known			" " "
Same	"	" "	257	" "	" "	" " "
		For 1880.				
Same	Lee	In fee	162	Black	water	" " "
Same	"	" "	46	E F		" " "
Same	"	" "	50			" " "
		For 1891				
Same	"	"	162	Black		" " "
Same	"	"	46	"		" " "
Same	"	"	50	"		" " "
Same	"	"	14 3/4			" " "
Same	"	"	58 3/4			" " "

with tax thereon at thirty cents on every Hundred Dollars Value thereof

Total value of land
per acre, including
buildings.

\$25
\$3.

\$1.00

2.00

3.00

2.00

3.00

3.00

3.00

3.00

3.00

Abstract

Copy List: S. W. Richmond Clerk
Lee County Court.

Virginia.

A circuit Court continued and held for
Lee County at the Court house thereof on
the 27th day of November 1886.

Joseph L. Willis

Plaintiff

against

James W. Orr Administrator of A. R. Durgener deceased

Defendant

In Chancery.

This cause came on this day to be heard
upon the bill of the plff, the answer of
the defendant and replication thereto, the
depositions of witnesses, and being argued
by counsel. The court is of opinion
and hath so adjudged, order and decree
that the injunction heretofore granted in
this cause on the 23rd day of March 1886,
be and the same is hereby perpetuated, and
the said Joseph Willis forever released from
the payment of the bond of trust in the
bill and proceedings mentioned or any
part thereof. And that the plff recover
from the defendant James W. Orr administrator
of the estate of A. R. Durgener deceased
the costs of this suit to be paid out of any
assets in his hands administered. And no
further action being necessary the Cause is
stricken from the docket.

Attest.

Teste - A. D. Murmery Clerk
by W. H. Richmond, D.C.

Jos. Willis
vs J. C. M.
J. L. Orr, Adams & C.

"Deo no"

Filed with J. L. Orr
J. L. Orr in Chy
ant &
Levy & Williams
vs J. C. M.
J. L. Orr et al

Filed Oct 5 - 1876.
H. C. Joslyn J. P.

Levy & Williams, Adms

vs } In Chy

Joseph Willis et al

Exhibits filed with
depositions of plff
this Oct 9th 1896.

H. C. Jorlyn Ad

Filed October the 10th 1896
A. B. Munsey clk.

The Commonwealth of Virginia,

To the Sheriff of the County of Lee---Greeting:

We Command you, That you summon

Joseph Willist & J. H. Glass

to appear at the Clerk's Office of the Circuit Court of the County of Lee, at the rules to be held
for the said Court on the *3d* Monday in *May*, 189*6*, to answer a

bill in Chancery, exhibited against *them* in our said court by

*N. S. Cox & A. C. Williams administrators of the
estate of A. J. Lockhart deceased*

And have then there this writ. Witness, A. B. MUNSEY, Clerk of our said Court, at the court-
house, the *4th* day of *May*, 189*6*, and in the
12*0th* year of the Commonwealth.

A. B. Munsey Clerk.

adms
Al Williams et al

SUPENA.

vs. }

IN CHANCERY.

Joseph Willis et al

Or Blankenship p. q.

To 2nd May Rules.

CIRCUIT COURT.

Executed by delivering
a true copy of the
within to Joseph
Willis and J. W.
Glass

This May 18, 1896
Eron Bledsoe
for W Pmblor 200

The Commonwealth of Virginia,

To the Sheriff of the County of Lee---Greeting:

We Command you to summon *Thomas M. Hurron and*
France Miles

at the Law Office of OTT Blankenship (of Lee County)
to appear before the Judge of our Circuit Court of Lee County, at the court-house thereof on the

5th day of *Oct* 189*6*, to testify and the truth to say in behalf of the
N. S. Cooy & A. B. Williams, Admins &c

in a certain matter of controversy in *the circuit* ~~our said~~ Court,
before the ~~said~~ *thurs* Judge depending and undetermined between

N. S. Cooy & A. B. Williams, Admins Plaintiff *S*

and

Joseph Willis & J. W. Glass Defendant *S?*

And have then there this writ. Witness, A. B. MUNSEY, Clerk of our said Court, at the court-
house, the *12th* day of *Sept* 189*6*, and in the
12/*~* year of the Commonwealth.

A. B. Munsey Clerk.

Looy Williams, Admrs

{ SUBPENA
FOR
WITNESS.

Joseph Willis et al

Circuit Court, the
5 day of Oct-

1896.

Executed by Summoning

Thos McPherson

& Grace Miles

this September

21st 1896

Eron Bledsoe

for W P Mester
JSS